

Letter 9a, continued

Lawrence M. Doyle

I-75 Widening from 8 Mile to M-59 Environmental Impact

February 25, 2004

Page 8 of 8

cc: Joseph Corradino, The Corradino Group, First Centre, Ste. 300 N. 200 S. 5th St., Louisville, KY 40201
Sue Datta, ACIP, Proj. Manager, MDOT, 18101 W. 9 Mi. Southfield, MI 48075
Bob DeCorte, Traffic Improvement Association, 2709 S. Telegraph Rd., Bloomfield Hills, MI
Liz Tillander, Exec. Dir., R.O. Chamber of Commerce, 200 S. Washington Ave., Royal Oak, MI 48067
Charles Semchena, City Attorney
Ted Quisenberry, Police Chief
Richard Strehlke, Fire Chief
James Giereman, City Assessor
Tim Thwing, City Planner
Tom Trice, Director of Recreation and Public Services
Gregory Rassel Superintendent of Public Works
Rick Lang, Superintendent of Sewer and Water
Elden Danielson, Civil Engineer III

At a Regular Meeting of the Royal Oak City Commission held on Monday, March 1, 2004, in City Hall, 211 Williams Street, the following Resolution was adopted:

BE IT RESOLVED that the City of Royal Oak requests that before the proposed M.D.O.T. I-75 Widening Project between 8 Mile Road and M-59 is started, the collapsing and badly deteriorated sound walls caused by a defective sound wall expansion joint design on the north side of westbound 10 Mile Road adjacent to Royal Oak be properly repaired under the current "Preserve First" M.D.O.T. Road Improvement Program.

BE IT FURTHER RESOLVED that the "Draft Environmental Impact Statement for the Proposed I-75 Widening Project" include a more in-depth study of the impacts of Mass Transit in the Woodward Corridor between Detroit and Pontiac including the reduction in air pollution in the metropolitan area, and increased job growth in Oakland and Wayne Counties.

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not remove the east/west I-696 exit to Eleven Mile Road at I-75 because of increased traffic and public safety concerns in Royal Oak on Mohawk area residential streets north of I-696, on southbound Stephenson Highway south of Lincoln, and on westbound Lincoln west of I-75 caused by the proposed freeway changes.

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not remove the 11 Mile Rd. exit from northbound I-696 because this exit could increase emergency vehicle response time to southbound I-75 life safety problems.

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not remove the 11 Mile Rd. exit from northbound I-696 because of detrimental economic impacts on Royal Oak Eleven Mile business.

BE IT FURTHER RESOLVED that the proposed I-75 Widening Project not relocate the eastbound Fourth Street entrance ramp to southbound I-75 because of increased traffic and public safety concerns on the following Royal Oak residential streets; Helene north of Fourth; Minerva north of Fourth; and Edgeworth north of Fourth caused by the freeway change.

BE IT FURTHER RESOLVED that the eastbound Fourth Street entrance ramp to southbound I-75 not be relocated north because of increasing emergency vehicle response times to life safety problems on the freeway.

BE IT FURTHER RESOLVED that the Dallas Bridge over I-75 not be removed as it will increase Police Department and Fire Department emergency vehicle response times between Royal Oak and Madison Heights and to I-696/I-75 interchange life safety problems.

BE IT FURTHER RESOLVED that the proposed I-75 Widening improvement problems addressed in this resolution be eliminated to mitigate additional Royal Oak Police Department costs created by the proposed freeway changes.

BE IT FURTHER RESOLVED that the City of Royal Oak be allowed to provide meaningful input into the construction detours selected for the proposed I-75 Widening Project to reduce the impact of detour traffic on Royal Oak residents and provide for proper public safety.

I hereby certify that the foregoing is a true and correct copy of a Resolution adopted by the Royal Oak City Commission at a meeting held on March 1, 2004.

Mary Ellen Weaver

City Clerk

At a Regular Meeting of the Royal Oak City Commission held on Monday, March 7, 2005, in City Hall, 211 Williams Street, the following Resolution was adopted:

WHEREAS, the City of Royal Oak has been reviewing and commenting upon the proposed plan for widening I-75; and

WHEREAS, the City of Royal Oak has previously expressed several concerns about the proposed widening plan on the residents of the City; and

WHEREAS, the MDOT has made revisions to the proposed I-75 widening plan that successfully address some of the concerns of the residents as previously transmitted to the MDOT; and

WHEREAS, the City of Royal Oak has an appreciation for the effort involved by the MDOT to reconfigure the proposed I-75 widening plan; and

WHEREAS, the City of Royal Oak as a matter of policy extends its appreciation to those agencies that are responsive in a positive manner to the City's concerns about matters of public concern.

BE IT HEREBY RESOLVED that the City of Royal Oak expresses its thanks to the MDOT for its efforts in reconfiguring the proposed I-696/I-75/Eleven Mile Road intersection to accommodate traffic exiting I-696 onto Eleven Mile Road; and

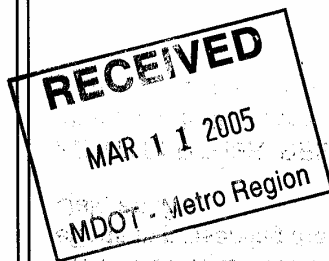
BE IT FURTHER RESOLVED the City of Royal Oak expresses its thanks to the MDOT for its efforts in preserving the existing entrance onto I-75 southbound at 4th Street in the City of Royal Oak; and

BE IT FURTHER RESOLVED the City of Royal Oak respectfully requests that the MDOT attempt to further reconfigure the proposed I-75 northbound exit onto Eleven Mile Road that will have the least negative effect on the surrounding neighborhoods in the City of Royal Oak.

I hereby certify that the foregoing is a true and correct copy of a Resolution adopted by the Royal Oak City Commission at a meeting held on March 7, 2005.

Mary Ellen Graven

City Clerk



6.4.9 City of Royal Oak – Letter 9 and Resolutions 9b and 9c

Response 9-1: Through continued coordination and analysis with local municipalities, including emergency services, the I-696 access to 11 Mile Road will be maintained by the modified braid presented in this FEIS. Access to 11 Mile is maintained. The opportunity will also exist to turn west on Lincoln Avenue, as the shifted off ramp will connect to the service drive south of Lincoln Avenue.

Response 9-2: The Dallas Avenue bridge will need to be removed. However, the lookout point can be maintained by leaving a portion of the bridge approach on the west side of I-75 intact. In addition, in discussions with the city of Royal Oak and Madison Heights, MDOT indicated ITS approaches may be possible, such as siting cameras at the interchange to allow determination of crash locations and the best routes to them. MDOT will continue to consult with local jurisdictions to identify improved communications to facilitate response times. These discussions will continue through the design phase to ensure that, if modifications are needed, they are coordinated properly. There may be minor shifts in traffic, but these can easily be accommodated by the local road system. A new crossover bridge serving movements from east-to-west will be added with the project south of Lincoln.

Response 9-3: After additional coordination with Royal Oak and Madison Heights and consideration of comments, additional analysis determined that access to the 4th Street ramp will be maintained.

Response 9-4: Any increase of traffic on Lincoln would be local traffic by Royal Oak residents. Local traffic will have the choice of using Lincoln or 11 Mile Road. The shift of the northbound off ramp from I-75 to the northbound service drive several blocks south is necessary as part of the braid configuration that maintains access from I-696 to 11 Mile Road.

Response 9-5: The EIS did do an in depth study of mass transit. Two technical reports have been produced (Technical Memorandum 1, *Analysis of Transit and HOV Concepts* and Technical Memorandum 2, *Refined Analysis of Transit and HOV Concepts*). Analysis shows that a rapid transit system will not alleviate the need for an additional lane on I-75. However, the analysis found that mass transit is viable in the Woodward Corridor (Section 3.6). But rapid transit cannot meet the project purpose and need. The Preferred Alternative of a new lane dedicated to use by HOV in peak period hours supports mobility and encourages transit and ridesharing.

Response 9-6: The maintenance of traffic program, including detour routes, will be developed through local coordination with appropriate representatives of Royal Oak and Madison Heights as a part of the design phase of the project.

Response 9-7: MDOT is committed to continue to coordinate with the city of Royal Oak in an effort to minimize negative impacts to the surrounding communities through the design and construction phases of this project.



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524-3311

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524-3344

Bldg. Operations
524-3368

City Clerk
524-3316

City Manager
524-3330

Community Affairs
524-1147

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General Information
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CITY OF TROY
OAKLAND COUNTY, MICHIGAN

RESOLUTION

**Environment Impact Statement for Widening and
Reconstruction of I-75 from M-102 to M-59**

At a Regular meeting of the Troy City Council held on Monday,
March 1, 2004, the following Resolution was passed:

Resolution #2004-03-120
Moved by Beltramini
Seconded by Lambert

WHEREAS, Improvements to the I-75 Corridor such as additional
lanes on I-75, interchange improvements and local roadway
improvements are overdue, and are recommended by the I-75
corridor study; and

WHEREAS, The lack of these improvements continues to
exacerbate traffic congestion concerns in the City and the region.

NOW, THEREFORE, BE IT RESOLVED, That the City Council of
the City of Troy **RECOMMENDS** that the Draft Environmental Impact
Statement for the I-75 Corridor Study be approved by the Federal
Highway Administration and **ENCOURAGES** communities along I-75
to support the DEIS, for the timely approval of federal funds for the
completion of the recommended improvements.

Yes: All-6
No: None
Absent: Broomfield

I, Barbara A. Holmes, duly appointed Deputy Clerk of the City of
Troy, do hereby certify that the foregoing constitutes a true and
complete copy of a resolution adopted by the Troy City Council at a
Regular Meeting duly called and held on Monday, the Twelfth day of
May, 2003.

Barbara A. Holmes, CMC
Deputy City Clerk

10-1

6.4.10 City of Troy – Letter 10

Response 10-1: Comment acknowledged.



John P. McCulloch
DRAIN COMMISSIONER
OAKLAND COUNTY

Kevin R. Larsen
CHIEF DEPUTY
DRAIN COMMISSIONER

One Public Works Drive
Building 95 West
Waterford, MI 48328-1907
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P 248.858.0958
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January 30, 2004

Ms. Margaret M. Barondess, Manager
Environmental Section
Project Planning Division
Murray D. Van Wagoner Building
P.O. Box 30050
Lansing, MI 48909

Reference: Multiple Drain Involvements; Widening and Reconstruction of I-75 from M-102 to M-59; Oakland County, Michigan

Dear Ms. Barondess:

The Oakland County Drain Commissioner's Office has reviewed a draft of the Environmental Impact Statement (EIS) for the proposed widening and reconstruction of I-75 from M-102 to M-59. This office recognizes that there will be several drain involvements throughout the span of the project.

Detailed plans for all drain involvements need to be submitted to this office prior to the start of any construction affecting a County Drain. All plans should be submitted with calculations and drainage break-up sheets as required. Any proposed watercourse isolations from the construction project also need to be submitted prior to construction. A permit for the work will be required.

If there are any questions regarding this matter, please contact Chuck Lawhorn (248-452-8681) of this office.

Very truly yours,

OAKLAND COUNTY DRAIN COMMISSIONER

By: _____

Steven A. Korth, P.E.
Assistant Chief Engineer

11-1

6.4.11 Oakland County Drain Commission – Letter 11

Response 11-1: Comment acknowledged.



January 15, 2004

Board of Road Commissioners

Richard G. Skarritt
Chairman

Rudy D. Lozano
Vice-Chairman

Larry P. Crake
Commissioner

Brent O. Bair
Managing Director

Gerald M. Holmberg
Deputy Managing Director
County Highway Engineer

Planning &
Development Department

31001 Lahser Road
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www.rcocweb.org

Ms. Margaret M. Barondess, Manager
Michigan Department of Transportation
Environmental Section
Project Planning Division
Post Office Box 30050
Lansing, Michigan 48909

RE: I-75 Draft EIS

Dear Ms. Barondess:

The Road Commission supports the desired outcome of adding one lane in each direction to the I-75 freeway through Oakland County. The increase of 33 1/3% capacity is urgently needed to support existing employment centers and accommodate the mobility desires of our residents. Mobility, safety, the economy and job growth of Oakland County are all heavily dependent on the efficient functionality of I-75 in the future, thus making this widening a critical project.

There are many benefits to such an action. First, given the existing highway and its public right of way, a significant increase in system capacity and mobility can be achieved with practically no acquisition of right of way and few impacts to the natural or social environment. Nearly all effects on the environment, and all issues of Environmental Justice, occurred in the 1960's and 1970's when the roadway was initially constructed. In addition, by increasing capacity we can reduce freeway congestion and thus, increase air quality in the corridor.

Second, this widening is the best way to improve the north-south flow between Detroit and Flint because the exiting corridor traverses the county on a diagonal, cutting across the underlying grid pattern of local roads. Thus, it would be impossible to generate the same capacity increase using the local road network without an enormous impact to the Oakland County environment. This is becoming more critical as both jobs and residential development continue to move north and northwest within Oakland County putting a strain on the road network in those directions.

12-1



Ms. Barondess
January 15, 2004
Page 2

A significant benefit to our residents of additional freeway capacity on I-75 will be the reduced congestion on, and greater longevity of, the numerous city, county, and state roads in the adjacent I-75 corridor. Those roads in the corridor which need to be widened to make I-75 function better have been identified in the current study and steps are in progress to improve those roads.

Obvious benefits to I-75 travelers include better separation of cars and heavy trucks; providing two lanes for each should greatly reduce conflicts and accidents. The extra lane also will provide better access and higher speeds for express bus services between suburbs and center city. The added lanes will provide smoother ingress and egress at all interchanges with fewer adverse effects on through traffic. Similarly, traffic will be less effected by accidents and breakdowns on the shoulder with an extra lane to move around the problem. These issues are critical to providing greater safety on I-75 as well as adjacent surface streets, especially as volumes grow and urban densities increase.

While we do not support HOV lanes at the loss of through lanes, we strongly believe new Single-Point (SPUI) designs should be installed at both Twelve Mile Road and Fourteen Mile Road to replace the existing interchanges for better flow on the local roads.

12-2

In summary, we at the Road Commission find the benefits to be many, while the required right-of-way and adverse impacts are few due to use of the existing I-75 right-of-way. This project is greatly needed for both safety and convenience and we encourage MDOT to move toward construction as quickly as possible.

Sincerely,

Brent O. Bair
Managing Director

BB:amj

Cc: Joe Corradino, Corradino Associates
Sue Datta, MDOT - Region
Gerald Holmberg, RCOG

Letter 12b – January 27, 2004, Road Commission for Oakland County

January 27, 2004



Board of Road Commissioners

Richard G. Skarritt
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Vice-Chairman

Larry P. Crake
Commissioner

Brent O. Bair
Managing Director

Tim Holmberg
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Ms. Margaret M. Barondess, Manager
Michigan Department of Transportation
Environmental Section
Project Planning Division
P. O. Box 30050
Lansing, Michigan 48909

RE: I-75 DRAFT EIS

Dear Ms. Barondess:

It has been brought to my attention that a paragraph in my January 15, 2004 letter on this subject contains vague, if not confusing language about the Road Commission for Oakland County's position on HOV lanes. This letter is an attempt to clarify our position.

The Road Commission is not opposed to HOV lanes in principle. In fact, we believe HOV, or HOT lanes, in the right place and under appropriate circumstances, are valuable and useful components to a well-rounded transportation network.

In this circumstance, we prefer the new lanes be for general-purpose use. However, that should not rule out HOV/HOT lanes for further study and evaluation to see if they might function well as additions to the I-75 corridor in Oakland County. It may be possible that HOV lanes with rules modified to suit our unique conditions will work well in this corridor. If further evaluation can convince us of that fact, we may support them as part of this project.

I trust this clarifies my earlier letter and indicates our willingness to work with all parties to complete this I-75 EPE project.

Sincerely,

A handwritten signature of Brent O. Bair in dark ink.
Brent O. Bair
Managing Director

/lb

12-3

6.4.12 Road Commission for Oakland County – Letters 12a and 12b

Response 12-1: Comments acknowledged.

Response 12-2: See Section 3.7.3 of this FEIS. The SPUI design cannot provide an acceptable level of service at 14 Mile Road due to unbalanced traffic, as a result of the traffic generators in the area. A reconstruction with the same basic configuration is proposed and will provide an acceptable level of service. This is also true for 12 Mile Road. However, during the design and value engineering process, the SPUI interchange design will be reexamined. The Preferred Alternative is a blend of a general purpose lane and an HOV lane during the peak hours to maximize the lane's usage. It is estimated that about four hours a day, the lane will operate as an HOV lane. The remaining 20 hours a day, the lane will operate as a general purpose lane.

Response 12-3: HOT lanes are high occupancy toll lanes. HOT lanes offer the option to the public of using the HOV lane for a fee. It should be recognized that in practice, HOT lanes are generally implemented when HOV lanes are barrier-separated from general traffic flow and are only established after the rate of use of an HOV lane is known from actual experience. HOT lanes also require a substantial capital investment and an oversight agency with tolling authority. MDOT will study HOT lanes in the future, should it be required.

Letter 13

February 23, 2004, – SEMCOG, the Southeast Michigan Council of Governments, including Unsigned Draft Interdepartmental Communication from City Manager of Ferndale

SEMCOG . . . Local Governments Advancing Southeast Michigan

Southeast Michigan Council of Governments • 535 Griswold Street, Suite 300 • Detroit, Michigan 48226-3602 • 313-961-4266 • Fax 313-961-4869

www.semco.org

February 23, 2004

Margaret M. Barondess, Manager
Michigan Department of Transportation
Project Planning Division/Environmental Section
P.O. Box 30050
Lansing, Michigan 48909

RE: Draft Environmental Impact Statement (DEIS) for the Proposed Widening and Reconstruction I-75 from M-102 to M-59, Oakland County
Regional Clearinghouse Code: TR 040001

Dear Ms Barondess:

SEMCOG, the Southeast Michigan Council of Governments, has processed a review for the above Draft EIS according to intergovernmental review procedures established in the National Environmental Policy Act and assumed in U.S. Department of Transportation review procedures.

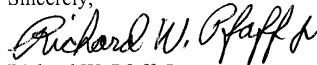
As the designated Metropolitan Planning Organization and regional planning agency for Southeast Michigan, we notified the following local government agencies of your project and requested comments:

Oakland County Planning & Economic Development Services Wayne County Planning Division
Detroit Planning & Development Department SMART
Cities of Auburn Hills, Ferndale, Hazel Park, Madison Heights, Royal Oak & Troy
Bloomfield Township

As of this date, the City Manager of the City of Ferndale has submitted written comments which were previously provided at the MDOT Public Hearing on January 27, 2004. We will forward additional comments, if any, for your information and attention.

SEMCOG's staff has reviewed the Draft EIS which you submitted and offers the attached comments from SEMCOG's Transportation Planning and Environmental Planning staff (J. Tumidanski, 2/11/04 and W. Parkus 2/11/04). These comments address elements of transportation planning consistency with specific comments on transit, environmental justice, water quality impacts and air quality conformity. Please consider these comments and suggestions when preparing the Final Environmental Impact Statement.

Sincerely,



Richard W. Pfaff, Jr.
Regional Review Coordinator

RWP/bar

Attachments

cc: T. Barwin, City Manager/City of Ferndale

Maryann Mahaffey
Chairperson
Council President,
City of Detroit

Joan Flynn
First Vice Chairperson
Commissioner,
Macomb County

Mary Blackmon
Vice Chairperson
Member, Wayne County
Regional Education
Service Agency

David L. Moffitt
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of Harrison

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Immediate Past Chair
Supervisor,
Bedford Township

Paul E. Tait
Executive Director

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SEMCOG MEMO

Southeast Michigan Council of Governments
535 Griswold Street, Suite 300
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(313) 961-4266
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February 11, 2004

TO: Richard W. Pfaff Jr., Regional Review Coordinator

FROM: Jeffrey J. Tumidanski, Transportation Planner
William B. Parkus, Environmental Planner

SUBJECT: Draft Environmental Impact Statement For the Widening and Reconstruction of
I-75, from M-102 to M-59 in Oakland County TR 040001

Staff has reviewed the above draft environmental impact statement (DEIS) for consistency with the Regional Transportation Plan (RTP), Transportation Improvement Program (TIP), the Transit Plan, environmental justice (EJ), water quality impacts, and air quality conformity. General comments are also provided.

General Comments

It is difficult to ascertain which alternative is preferred. The document leads one to assume that the Option C of the HOV lane alternative is the preferred one.

13-1

The DEIS grew out of a study that reviewed I-75, and the streets that feed it, or act as alternative routes. The document indicates that many trips are internal to Oakland County. A discussion of how improvement to county and city roads would impact I-75 traffic volumes should also be included.

13-2

Transit

Section 1.2.5 and 3.6 indicate that development of a rapid transit system has significant potential in the Woodward Corridor, especially south of 9 Mile Road, but, if implemented, would not eliminate the need to add a lane on I-75. While we concur with this analysis, SEMCOG's analysis indicates that development of a high-level rapid transit system for Southeast Michigan, consistent with the adopted SEMCOG Transit Plan, will have benefits and provide an option to using I-75. Providing high-level transit service, along with promoting ridesharing, and other demand management strategies will provide real travel options and allow I-75, when widened, to operate at even better levels of service and enhance mobility throughout the entire corridor.

13-3

Consistency with TIP and RTP

The project is currently not in either the Regional Transportation Improvement Program (TIP) or the 2025 Regional Transportation Plan (RTP) for construction. It has appeared in previous TIPs and RTPs as a study. This project is proposed for inclusion in the 2030 RTP for construction in

13-4

Letter 13, continued

SUBJECT: Draft Environmental Impact Statement For the Widening and Reconstruction of
I-75, from M-102 to M-59 in Oakland County

the 2011-2015 time period for \$533 million in construction costs. Section 6.3 of the DEIS should indicate the above.

13-4

Environmental Justice

Section 4.3 indicates that the proposed improvements to I-75 will not cause disproportionately high and adverse human health or environmental effects on minority or low-income populations. The analysis provided to support this statement should be enhanced to reflect improved access to jobs, work sites, and other critical areas for these populations as a result of the proposed improvement.

13-5

In addition, the DEIS should indicate any special outreach efforts used to notify and involve these populations throughout the planning process.

Water Quality Impacts

Storm water removal

In the depressed section of I-75 between Eight Mile and 12 Mile Roads, the DEIS states that planning was underway to separate the storm water system from the combined sewer system for the purpose of reducing combined sewer overflows (CSOs). While CSOs are permitted under the federal Clean Water Act of 1977, any activity to reduce them will be beneficial to water quality.

The selected method for removing and disposing of the storm water in that four-mile stretch of the I-75 roadway has not yet been identified. There is little or no discussion of what options might be considered.

13-6

In other areas of the I-75 roadway, detention of runoff is planned. According to the DEIS about seven acres of additional road ROW is planned for storm water detention. All storm water facilities and discharges must meet Phase II Storm Water requirements.

13-7

Contaminated sites

The DEIS identifies 49 contaminated sites within the project area. Most of these were USTs (underground storage tanks). The major concern to the project from these nearby sites is the potential for migration of contamination beneath the I-75 ROW. Provisions should be developed now for the removal, treatment (if needed), and disposal of contaminated sediment, if encountered during construction.

13-8

Wetlands protection

The DEIS identifies only the HOV alternative as impacting any wetlands (0.41 acres), the general purpose lane alternative would not. Forty-one individual wetlands, ranging from high to low value, are identified in the project area. These wetlands should not be disturbed either by sedimentation pollution or physical encroachment. Thus, permits under Part 303 (Wetland Protection) and Part 91 (Soil Erosion and Sedimentation Control) of P.A. 451 of 1994, the Natural Resources and Environmental Protection Act, may be required.

13-9

SUBJECT: Draft Environmental Impact Statement For the Widening and Reconstruction of
I-75, from M-102 to M-59 in Oakland County

Air Quality Conformity and Congestion

Sections 1.3.6 and 4.7 state that air quality along I-75 will be improved to the extent there will be less idling and smoother traffic flow. While this is inherently true, there is no data provided to support this statement. In fact, the CO analysis indicates that CO readings will actually be higher in the build rather than the no-build situation in 2025. It is, however, true that the standards for CO would likely not be violated under either build or no-build conditions. The DEIS should be revised or data included that supports the statement.

13-10

In addition, a statement is made in Section 4.7, that there is no method approved by EPA to calculate air toxics produced by vehicles. We believe that EPA considers the MOBILE6.2 toxics calculator as an approved method. However, as the EIS correctly points out, there is no standard to compare these calculations. The DEIS should be revised to reflect the above comment.

13-11

Finally, we suggest that reference to MOBILE6.2 be made earlier in the analysis, as it was used to estimate CO concentrations.

13-12

Letter 13, continued

From: "Thomas Barwin" <TBarwin@Ameritech.net>
To: <pfaff@semcog.org>
Date: 2/17/04 9:44AM
Subject: I-75 DEIS Comments

Richard,

Enclosed are Ferndale's preliminary comments regarding the I-75 DEIS. I am also very concerned that the study overly narrows environmental and economic justice considerations, which I hope to find the time to provide further comments on. Please confirm that you have received the attachment, which was originally presented to the study team at the recent public hearing in Troy on January 27, 2004.

Tom Barwin

City Manager - Ferndale

DRAFT

CITY OF FERNDALE

INTERDEPARTMENTAL COMMUNICATION

DATE: January 26, 2004
TO: Mayor and Council
FROM: Thomas W. Barwin, City Manager
RE: Oakland County I-75 Expansion, Draft Environmental Impact Statement (DEIS)

BACKGROUND

As Council is aware, the Michigan Department of Transportation (MDOT) is moving through the study and regulatory process necessary to authorize and pursue federal funding participation to undertake the widening of I-75 in Oakland County from Eight Mile (M102) to M-59. As currently being discussed, this specific segment is part of a larger plan to expand I-75 throughout Oakland County. The project would add one lane in each direction for the 18-mile stretch between Eight Mile and M-59. Once completed, the expanded I-75 will save 90 seconds off a commute time each day.

The MDOT I-75 Corridor Feasibility Study in Oakland County was completed in November 2002 and recommended providing four through lanes in each direction throughout Oakland County. The expansion may be necessary because I-75 is experiencing congestion in the peak periods which will get more severe if current development trends continue as projected by SEMCOG. Although the feasibility study recommends expanding I-75 throughout all of Oakland County, the Eight Mile to M-59 has been broken off as a separate and free standing project because, according to MDOT consultants, it has "independent utility" and can stand alone.

The DEIS follows from the I-75 feasibility study and is listed in SEMCOG's 2025 Regional Transportation Plan, in SEMCOG's Transportation Improvement Program (TIP) and in the MDOT Five-Year Road and Bridge Program (2003-2007) for the Metro Region. Upon approval of the DEIS and Final EIS (FEIS) by MDOT, it will be forwarded to the Federal Highway Administration (FHWA) with a recommendation that a Record of Decision (ROD) be issued. A ROD will act as the Location/Design Approval document allowing the project to move forward to the design and funding stage. Once funding is secured the construction phases will begin.

PURPOSE OF DEIS

Federal regulations in place since 1969 requires that the social, economic and natural environmental impacts of any proposed action of the federal government be analyzed for decision-making and public information purposes. The executive summary report of the I-75 DEIS has been included in Council's agenda packet with a full copy delivered to my Office and the Ferndale Public Library for public review.

-2-

CITY OF FERNDALE AND PUBLIC COMMENT REVIEW PERIODS

SEMCOG serves as the Regional Review Office for transportation projects of this magnitude for the metro region. SEMCOG has requested any input our City may wish to provide on the study by February 11, 2004.

An MDOT public hearing on the DEIS is planned to be held on Tuesday, January 27, 2004, beginning at 4:00 p.m. until 8:00 p.m. at the Marriott Hotel, on Big Beaver Road in Troy. MDOT will consider public input on the DEIS for approximately 45 days.

DIRECT COSTS OF THE I-75 EXPANSION PLANS IN OAKLAND COUNTY

The direct costs to expand I-75 from Eight Mile to M-59 as a stand alone project is estimated to be \$530 million in 2004 dollars. A major weakness of the I-75 DEIS and a basic problem with how SEMCOG, MDOT and their consultants approach transportation decisions in Southeast Michigan can be uncovered by a careful reading of the full DEIS which ignores or fudges over other road improvement costs which will become necessary as a result of expanding I-75.

NEEDS AND COSTS TO EXPAND SURFACE STREETS FEEDING I-75 IGNORED IN DEIS REPORT

While the executive summaries and public pronouncements by MDOT claim the I-75 stand alone project will cost \$530 million the fact is that the traffic which will be drawn or induced to an expanded I-75 (increasing capacity by 33%) will necessitate the need to expand 56 miles of arterial or surface streets that take vehicular traffic to and from an enlarged I-75.

This fact as reported in the small print of the expanded DEIS leads staff to our first finding; which is that the Eight Mile to M-59 expansion of I-75 is not, nor should it be considered a stand alone project. It appears that the forces behind the push to expand I-75 in Oakland County have chosen not to be forthright with taxpayers and our sister communities and/or are willing to have the expansion of I-75 move forward and leave local governments, businesses and communities adversely impacted by an expanded I-75 to fend for themselves by creating localized gridlock and unfunded local infrastructure liability.

13-13

The costs to complete the expansion of the 56 miles of streets necessary to service a larger I-75 has not been reported in the DEIS but certainly should be. If the streets serving an expanded I-75 are not modified as the previous studies have documented will be necessary, the purpose of expanding I-75, to relieve traffic congestion and commuting time within Oakland County, will have been negated. Although the current I-75 DEIS does not mention the costs of expanding the 56 miles of feeder roads, the earlier and broader I-75 feasibility study effort estimated the full project (I-75 and its arterial service roads) to be approximately \$1 billion.

13-14

Other costs not mentioned in the study related to I-75 in Oakland County include reconstructing the I-75 and M-59 interchange as well as expanding I-75 north of Joslyn Road. Based upon my participation on the I-75 Local Advisory Committee and past road building experience, the true costs to taxpayers of expanding I-75 in Oakland County as conceived in the original I-75 feasibility and confirmed in the DEIS study will conservatively

be much closer to \$1.5 billion than to the \$530 million reported in the DEIS.

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**IMPACTS OF SEGMENTING PROJECTS AND UNFUNDED MANDATES,
AGGRAVATED GRIDLOCK FOR MANY YEARS TO COME**

The I-75 project described in the feasibility study and DEIS is clearly being planned to accommodate the projected urban sprawl patterns in place for many decades and will clearly accelerate them. It appears however that due to the enormity and costs of the project, MDOT, and advocates of the project, has decided to segment various components of the project and undertake it in stages over a number of years, with a series of stand alone projects.

An analysis of the secondary road expansion needs caused by the "stand alone" I-75 project which is the subject of the DEIS, leads to a second finding, i.e. that congestion in the Oakland County I-75 corridor will not be alleviated by the Eight Mile to M-59 project alone, and will be aggravated for years to come as a result of the expansion of I-75 due to congestion which will be induced to the feeder streets which serve I-75, and lack of funding to make those associated improvements in advance of the I-75 expansion.

13-15

SOCIAL - ECONOMIC COSTS

Although one of the main purposes of the DEIS is to analyze the possible social and economic costs of major federal projects like the \$1.5 billion expansion of I-75, the DEIS before us makes little attempt to do so and repeatedly dismisses the opportunity to place the expansion of I-75, or other alternatives, into the context of the very serious social and economic problems which have plagued the region for years.

Surely MDOT and their consultants should be aware that metro Detroit remains one of if not the most racially and economically segregated regions in the country and that one of the regions most obvious social and economic problems is the disconnect between getting the unemployed and underemployed people of the region from their homes in Detroit and many of the older suburbs to new jobs in the exurbs. The DEIS fails to address this issue.

13-16

For example, in the section of the DEIS which discusses the project's possible impacts on the economy (pg 4-67) the study reports:

"Widening I-75 will have an effect on wealth distribution, but it is just one of many public policy decisions and market driven actions that are at work. Failure to widen I-75 is not a substitute for the need for fundamental changes, nor will it protect the wealth and quality of life of all commuters in Oakland County and Southeast Michigan. Such change is embodied in the recommendations Governor Granholm's Michigan Land Use Leadership Council."

In short, the good news is the study does seem to recognize that continuing the trend to build bigger roads out into green fields will continue to sprawl the economy out away from those who most need to be near jobs (as 25% of Detroiters do not have cars). The bad news is the DEIS dismisses the critical importance the transportation system has on these patterns and punts on the subject by saying other factors can be addressed to work on the deep and troubling social and economic problems we are all aware of. While the right transportation solutions could help contribute to the solving of multiple social, transportation and economic objectives (for example, the growing senior citizen population shies away from the use of busy freeways but have few other options) the DEIS and its consultants make no effort to bring any fresh thinking to the table during these most

Letter 13, continued

challenging times and simply ask us all to continue to do business as usual with little questioning and absolutely no regional strategic planning at a huge cost.

-4-

While most people who attended the public meetings on the I-75 asked and documented the need for multi-modal alternatives to expanding I-75 before expanding I-75, the project consultant told one crowd at a meeting in a heated meeting in the Troy Council Chambers, "there is no political will here to consider alternatives" and the report is clearly written that way despite the mounting volumes of data that continue to build which document the region's need to practice smart growth by coordinating future infrastructure expansions, diversifying our transportation system and metro economy. It appears the DEIS study has not been undertaken with a full and open mind with the will to solve multiple objectives at once wherein all transportation options would seriously be considered, but written based on the consultants reading of the regions "political will."

Therefore finding #3 is that the DEIS fails to give adequate consideration to the social and economic costs and ramifications of the expansion of I-75 and the multiple societal social and economic problems which could begin to be solved by recommending alternatives as priorities to the expansion of I-75 for the short and mid range future.

13-17

TRAFFIC AND SAFETY

Traffic and safety concerns remain a vital priority on the I-75 corridor and the studies have enumerated several which should be pursued, like improving the I-696 and I-75 interchanges and perhaps the Twelve Mile and Fourteen Mile interchanges.

Unfortunately the DEIS concludes that two of the most dangerous traffic safety concerns on I-75 will remain and perhaps be aggravated by the improvements.

Safe freeway shoulders should be a minimum of 12 feet in width. A good portion of the inside shoulders of I-75 are currently a very tight 10 feet which is a very dangerous and frightening situation for any motorist experiencing a breakdown on the inside lanes. Because of space limitations due to MDOT's desire to complete the expansion of I-75 within the current right-of-way, the inside shoulders of I-75 will remain 10 feet, as the traffic on I-75 will be increased by 33% with speeds also likely to increase due to more maneuvering lanes available to motorists. MDOT and its consultants have prioritized capacity and speed over safety on this important aspect of the project.

13-18

A second safety issue is the dangerous S curve on I-75 in Hazel Park. The DEIS study accurately identifies the S curve as a major safety problem but recommends that it not be addressed as so doing would require the costly taking of over 100 homes in Hazel Park. As mentioned above, an expanded I-75 with additional capacity and higher traffic speeds will likely result in a greater number of serious accidents in the S curve.

13-19

A review of the traffic and safety components of the study leads to staff finding #4, which is that the DEIS recommends an expanded I-75 retain 10 foot wide inside shoulders and the dangerous S curve in Hazel Park, contrary to basic safety requirements for new high capacity high speed roadways, creating more dangerous conditions on I-75 and additional liability issues for Michigan residents.

AIR QUALITY

Letter 13, continued

Southeast Michigan has recently been identified as a non-attainment area in terms of adhering to minimum air quality standards. As of this writing, it has not been determined how the region is going to come into compliance. While the DEIS suggests that an expanded I-75 will relieve traffic congestions and therefore minimize air pollution problems, this analysis falls short of the depth of analysis required in this day and age.

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First, adding capacity to I-75 will bring considerably more particulate matter air pollution to the communities located along the I-75 corridor from vehicular exhaust. This fine particulate matter has recently been identified by the American Cancer Institute and University studies as being a contributor to heart attacks. A more detailed analysis of fine particulate matter must be done to assure the residents of the I-75 corridor that their health will not be put in greater danger from the air pollution increases and particulate matter increases which will follow from an expanded I-75.

Several participants in the I-75 meetings also noted that southeast Michigan has one of the highest asthma rates of any region in the country. The impacts of expanding I-75 to current asthma sufferers of those susceptible to asthma should be considered in more detail.

13-20

During the study, I requested that some attempt be made to see if the Michigan Health Department, the Centers for Disease Control, or area hospitals had ever attempted a pin point map to determine if citizens who live near freeways for an extended period suffer from cancer, heart attacks, or respiratory problems to a higher degree than others. Some greater effort should be made to examine the data and research on health and proximity to freeways. State of the art standards for new freeway development call for 1,000 foot set backs between freeways and residential areas.

LAND USE

The DEIS discussion of the impacts of the I-75 project on future land use is so short and shallow as to be comical. While acknowledging that "rapid growth in mid and north Oakland County puts continued pressure on I-75," the study makes no effort to attempt to comment on how an expanded I-75 will further accelerate sprawl and bring even more development pressures and costs to Oakland County's northern tier communities as southern tier communities continue to lose population, jobs and the fiscal capacity necessary to maintain older, established communities.

13-21

The study does admit the region should strive to centralize jobs but ignores the impact expanding I-75 will have on further decentralizing jobs and further contributing to educational, employment, economic and housing segregation. As we typically do in the SEMCOG region, the Land Use Section of the DEIS acknowledges the many problems the region has which have resulted in the fiscal and crisis so many of our communities face, than the study proceeds to ignore how freeway expansions worsen those very problems.

For example, rather than acknowledge that an expanded I-75 will create new conditions which will create incentives for farm fields to be converted to new strip malls and/or low density, sub-divisions zoned for high income individuals, the DEIS simply says, *"The cumulative impact found that some farmland conversion occurs because the land is uneconomic for farm purposes."* Apparently the study authors have not noted the growing new trend toward organic farming and the need to have organic farms located near urban centers.

-6-

NOISE

Regarding this component of the study, I would suggest that an independent noise consultant review this section of the report due to so many of the other sections of the report being so dubious. Living two blocks from I-696, I can speak first hand of the constant noise which comes from a freeway. When the expansion of the 56 miles of roads are considered in conjunction with the expansion of I-75, significant noise impacts will occur to approximately 500 homes requiring special attention. To date, MDOT has not installed noise walls in many areas that have warranted them, nor adequately maintained them in Ferndale off of I-696, more evidence of MDOT overextending their fiscal commitment. Should this project ever go forward, aesthetically pleasing noise walls must be included along the entire route along with treatment to individual homes negatively impacted by noise elevations attributed to the expansion and not protected by noise walls.

13-22

ALTERNATIVES TO EXPANDING I-75

This section of the report is woefully incomplete and prematurely ended. Although the DEIS states unequivocally that light rail on Woodward is a viable alternative to the expansion of I-75, they then add, but only to Nine Mile. The brief analysis becomes confusing and is obviously incomplete as is the entire discussion of alternatives to the expansion of I-75.

The DEIS shirks factoring in how a blend of alternatives to expanding I-75 could help our state, area and region begin to make progress on a whole host of important public policy priorities. The DEIS simply concludes, with no in-depth analysis, that even if we implement the other alternatives to the expansion of I-75, I-75 should still be expanded because the other alternatives may not meet MDOT's expectations for moving cars under the current unbalanced development patterns projected by SEMCOG.

13-23

This thinking and shallow analysis is a good example of why southeast Michigan is in the situation it is in. Rather than examining and documenting how implementing alternatives to expanding I-75 could work, and reviewing how only expanding I-75 as a last step could save money, help create jobs, help revitalize our core communities, cut down on air, water and noise pollution, help diversify the economy, help connect those who are in need of good jobs to get good jobs, help improve public health and help stabilize our established communities while introducing new transportation modes into the region to serve our youth through senior citizens, and those who lose their licenses and jobs, the I-75 DEIS is obviously and simply an uninspired attempt to keep repeating the past.

TRAFFIC CONGESTION MITIGATION EFFORTS DURING MULTI YEAR I-75 AND ARTERIAL ROAD EXPANSIONS

Should the expansion of I-75 be implemented, the project would take several years to complete causing multiple years of traffic congestion on I-75 and all roads which feed I-75 or serve as an alternative to I-75. This would likely be true as well in various areas on the corridor as construction projects are required to expand the streets which serve I-75. This occurrence will have enormous negative impacts on the residents and businesses

13-24

along Woodward as MDOT has made it very clear of their intention to divert I-75 detours onto Woodward, as we have learned in our discussions with MDOT regarding the fate of the M-1 Bridge over Woodward.

13-24

Therefore a major omission of the DEIS is the lack of any plan as to how the region is going to handle the traffic congestion, pollution and general inconvenience and disruptions during the multiple years the I-75 expansion project will be underway.

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Because this will clearly be a nightmare, Finding #5 is that a light rail line should be installed on Woodward between Downtown Detroit and Downtown Pontiac as the first priority to moving people on the I-75 corridor. The predicted congestion on I-75 will serve to allow choice riders to have an alternative to traffic congestion on I-75 while creating an investment in our older communities and creating an incentive for new businesses to locate on the light rail corridor. Consultants have often been wrong in their predictions, and the new light rail line may minimize the need to dramatically expand traffic capacity on I-75 in favor of interchange improvements and safety enhancements.

13-23
Cont.

If the expansion of I-75 remains necessary after opening the M-1 light rail line, then it should go forward, but most importantly the corridor would have a clean transportation alternative in place to mitigate congestion and pollution during the multiple number of years the I-75 construction project is underway. This would be a logical and prudent compromise to the many forces involved in transportation planning in the region and provide an economic and quality of life boost to the area. It would also provide the opportunity to begin to see our federal transit dollars returned to the area to put people to work and to begin to seriously diversify the region's economy.

Should the consultants be correct and I-75 remain in need of expansion after light rail on M-1 opens, this will provide even more work for the construction industry while minimizing road rage and traffic congestion in Oakland County. It is time new modes of transit be introduced in the region, and for once an expanded freeway come after a clean mass transit, and only if absolutely necessary. Michigan population is and has been in a slow growth mode of approximately 1% per year.

CONCLUSION

The I-75 DEIS was not an objective study and makes little to no attempt to utilize the future spending of federal and state transportation dollars as an opportunity to solve multiple public policy goals and objectives. The true social, economic and environmental costs of the expansion of I-75 are not reported in the study nor are the potential benefits of alternatives factored in. The alternatives to the expansion of I-75 were prematurely and unwisely dismissed in favor of the biases of the past.

RECOMMENDATION

Moved by _____, seconded by _____, that MDOT's I-75, Oakland County DEIS study be rejected by SEMOG, the Federal Highway Administration, and I-75 corridor communities for the many reasons highlighted in Ferndale's review of the I-75 DEIS, including but not limited to: a) Incomplete, requiring greater documentation on fine particle pollutants and their potential impacts on public health in the corridor; b) Unaffordable for the foreseeable future, built roads already billions short of being able to be maintained; c) Will further aggravate urban sprawl placing financial pressures on new Greenfield communities, with no plans in place to maintain established south Oakland County Communities; d) Incomplete study of the combined benefits of the alternatives to the expansion of I-75 e) No traffic congestion and pollution mitigation plan recommended to be

Letter 13, continued

in place during the multiple years of construction; f) No funding identified to cover the costs of expanding 56 miles of local streets taking motorists to and from I-75; g) No effort made to analyze or discuss how transportation solutions could help solve, rather than further deepen, multiple public policy objectives related to poverty, employment, the environment, dependence on mid-east oil, land consumption at 12 times the rate of population growth, etc.; and h) As planned in the DEIS, I-75 expansion continues dangerous 10 feet inside shoulders and the S curve in Hazel Park

6.4.13 SEMCOG –The Southeast Michigan Council of Governments – Letter 13

Response 13-1: A preferred alternative was not identified prior to the public hearing in the DEIS. Identification of a preferred alternative after the public hearing is consistent with NEPA and FHWA and MDOT guidance. The Preferred Alternative is the HOV lane for the peak hours.

Response 13-2: The SEMCOG existing plus committed roadway network was used, including only those projects expected to be under construction in the next five years. Improvements to the local road system will only enhance the capacity and operation of the entire transportation network.

Response 13-3: Comment acknowledged. Additional language has been added to Sections 1.2.5 and 3.6.

Response 13-4: Language has been added to this FEIS indicating that the project is included in the *2030 Regional Transportation Plan* for construction in the 2011 to 2015 period.

Response 13-5: These positive effects on access and ridesharing opportunities for low-income and minority populations are now included in the text of this FEIS, in Section 4.3.

Response 13-6: Section 4.10 has been updated, reflecting the results of the completed drainage study. This information is now included. Two options were considered: routing storm water to the I-696 storm water system and routing it to the Red Run Drain. The latter was chosen as the available capacity of the I-696 system is not known. Therefore, the recommendation is to collect the storm water in a new system, constructed as part of the Preferred Alternative under the service drive on the east side of I-75, convey it to a detention area in the 12 Mile Road interchange, then allow it outflow by pipe along the alignment of the Red Run Drain to Red Run east of Dequindre Road.

Response 13-7: Comment acknowledged.

Response 13-8: Provisions are in place. The *Project Area Contamination Survey* identified one site for a Preliminary Site Investigation, prior to right-of-way acquisition. Any areas of contamination found by that PSI will be marked on design plans. Additional standard mitigation measures that could apply include:

- Testing/treatment of water from any dewatering operations before pumping to storm drains or surface water discharge points.

- Testing of river bottom sediments to determine proper disposal methods.
- Preparation of underground utility plans to ensure no deep utility cuts will impact any contaminated areas. Any utility cuts in contaminated areas will be reviewed to ensure proper excavation and backfill methods.
- Preparation of a Risk Assessment Plan, which includes a Worker Health and Safety Plan, to reduce dermal exposure and address direct contact issues, if contaminated materials are encountered.
- Closing and abandoning any monitoring wells properly.

Response 13-9: Comment acknowledged. Permits are anticipated as noted in Section 5.5.

Response 13-10: There is little available data on this subject. The US EPA Transportation Control Measure Program Information Directory (website) states the following:

“HOV impacts on travel are fairly well studied. Different types of HOV facilities achieve different amounts of time savings. The San Francisco Bay Area HOV Lanes Master Plan study estimated a range of time savings from 1 minute to nearly 20 minutes. HOV impacts on air quality are more complex and less studied . . . Assessments of the effectiveness of HOV lane facilities in reducing system-wide emissions have generally found reductions amounting to less than one percent. (Source: *Transportation Control Measure Information Documents*, Cambridge Systematics, Inc., U.S. Environmental Protection Agency, Washington, D.C. March 1992).”

CO values are higher with the project than without, because the vehicular volumes are greater and vehicles move at a higher speed with the project. For CO in the 45 to 65 miles per hour speed range, the emission factor in grams per mile increases with speed.

Response 13-11: There is a “PM Calculator” that is available for use to help states develop PM₁₀ and PM_{2.5} emission inventories for point sources, but this would not be applicable to mobile sources.

Response 13-12: The reference has been moved up in the discussion, per SEMCOG’s request.

Response 13-13: The project’s independent utility is noted in Section 1.1. It connects four-lane sections of I-75 to the north and south. Local road improvements will enhance the entire transportation network. One improvement will not negate the other. Improvements to the entire area will help the whole area operate better and provide options to motorists.

Response 13-14: The local road improvement costs are reported in Tables 4-22 and 4-23 in the indirect and cumulative effects analysis. Approval of this FEIS only provides environmental clearance for the improvements to I-75. Local road improvements are subject to similar analysis by the locally responsible authority.

Response 13-15: The project clearly alleviates congestion on I-75 through the project length (Section 2.2.3). An expanded Section 4.18 covers indirect and cumulative project effects. Generally, traffic is reduced on competitive travel routes. Vehicles are attracted to the greater capacity of I-75. The HOV alternative also provides additional attraction for carpoolers and transit riders.

Response 13-16: Section 4.4.1 states that more workers travel from Wayne County to Oakland County than the reverse. HOV lanes will expand mobility for those who do not own a vehicle by encouraging ridesharing and transit opportunities.

Response 13-17: The DEIS gave adequate consideration to all alternatives and their impacts. Alternatives were developed in the context of a defined purpose and need (Sections 2.1 and 2.2). Alternatives included TSM, TDM, and Intelligent Transportation System techniques, and mass transit (Sections 3.3 through 3.5). An extensive analysis of mass transit was performed (Technical Memorandum 2, *Refined Analysis of Transit and HOV Concepts*). A number of build alternatives were considered, including three approaches to HOV development. An accurate analysis of impacts was conducted for the practical alternatives. Technical reports were produced covering the topics of air quality, contaminated materials, cultural resources, drainage, indirect and cumulative impacts, noise, traffic, and wetlands. These adequately consider the social and economic costs and ramifications of the expansion of I-75.

Response 13-18: The ten-foot median shoulders meet current design standards. Construction of a wider shoulder of 12 feet was studied. It was determined that such shoulders would result in increased impacts in the form of acquisitions/relocations (Section 3.7.3), the cost of which could exceed an additional \$100 million. It was not considered a practical alternative as the social, economic and environmental impacts were unacceptable.

Response 13-19: The study analyzed “straightening” the “S” curve in Hazel Park. To do this, 150 parcels, including 100 residential structures, 20 business structures, a church, and an elementary school (Section 3.7.2) would be impacted. The cost would again exceed \$100 million and cause innumerable social and economic impacts. These significant impacts made it an impractical design alternative.

Response 13-20: Unfortunately, sufficient reliable methods are not available to provide credible estimates/forecasts of vehicular particulate matter's impacts on human health. Epidemiological health studies are not required as a part of the NEPA process at this time.

Response 13-21: Sprawl is addressed in the *Indirect and Cumulative Impact Analysis Technical Report*, January 2005; in the section entitled “Regional Issues.” Although transportation improvements provide greater access, responsible and compatible local land use planning should be considered by all adjacent communities in order to protect existing infrastructure investments.

Response 13-22: A series of criteria must be met for consideration of noise abatement (see Table 4-12, FHWA Noise Abatement Criteria). Typically, individual homes do not meet the adopted criteria. Determinations regarding the appearance of walls will result from future meetings with property owners in the sections eligible for such walls in the design phase of the project. Eighteen noise walls totaling 4.9 miles in length are proposed along the corridor.

Response 13-23: A new light rail line in the Woodward Avenue corridor, as defined by regional planning efforts, would not eliminate the need for a full lane addition on I-75 because it would not attract enough trips or divert enough trips. TSM and ITS solutions also cannot alone meet the purpose and need. As stated in Section 2.1, the purpose is “to increase the capacity of the transportation infrastructure in the I-75 corridor to meet travel demand for personal mobility and goods movement.” As stated in Section 2.2, the need is “for increased corridor capacity” (emphasis added). TSM and ITS solutions are in place already and are under constant review. These, in conjunction with a new light rail line, fall short of substituting for the I-75 lane addition.

The HOV lane will promote carpooling, ridesharing and transit on the freeway. Additionally, mass transit on the Woodward corridor would operate well, independent of, but complementary to, the improvements to the freeway.

Response 13-24: An analysis of the traffic shifts to Woodward Avenue during construction of the I-75 project was conducted for the Environmental Assessment prepared for the M-1/M-102 Project. Analysis showed that Woodward Avenue would handle the traffic without significant congestion or safety issues. As the closest state trunkline to I-75, it is logical that Woodward Avenue be utilized as the likely detour route during construction. In the past, M-1 has consistently been utilized during I-75 construction activities by motorists. This has been the case when it was marked specifically as a detour route and also when it was not. The M-1/M-102 bridge has played an important role in moving traffic along the M-1 corridor in a safe and expeditious manner. The rehabilitation of this bridge is vital to the maintenance of traffic on I-75 during construction. However, it should be noted that specific detour routes have not yet been developed. They are very important and will be addressed in the next phase of the project, in conjunctions with local communities, with the goal of minimizing impacts to the greatest extent possible. It should be noted that the lane addition makes maintenance of traffic easier because another lane is available into which traffic can be diverted.

**Letter 14 January 27, 2004, Suburban Mobility Authority for Regional
Transportation**

STATEMENT OF DAN G. DIRKS
GENERAL MANAGER
SUBURBAN MOBILITY AUTHORITY FOR REGIONAL TRANSPORTATION
(SMART)
January 27, 2004

SMART supports the efforts of the Michigan Department of Transportation (MDOT) in studying alternatives for the I-75 corridor in Oakland County. Our organization has been a part of the study team and was provided opportunities to comment on the plan most specifically as it relates to public transportation.

14-1

Southeastern Michigan is second only to the Napa Valley region in California as the most dispersed location of jobs in the country. Almost eighty percent of all jobs are more than ten miles or more away from the Detroit Central Business District. Thus, traditional factors that usually allow transit to be an attractive transportation alternative do not exist here as they do in many regions.

As part of the study process, SMART asked that an analysis be completed that would determine the percentage of trips with both an origin and destination within a mile of I-75. That number I believe was less than five percent.

If bus rapid transit, commuter rail or light rail were constructed along Woodward or the Grand Trunk Railroad right of way, it would have almost no effect on the traffic along I-75. Our CBD does not support the number of jobs that exist in areas where high ridership transit modes are needed.

We fully support the concept of an express lane for car/van poolers and public transportation that could be a part of an expanded I-75.

14-1

I appreciate the opportunity to comment on the process and the opportunity for SMART to be a part of the study team.

6.4.14 SMART – Letter 14

Response 14-1: Comments acknowledged.

6.4.14 Next Steps - Schedule

After this FEIS is approved and made available to the public, a Record of Decision (ROD) will be prepared that chronicles the decision-making process. When the Federal Highway Administration signs the ROD, the project can move forward to the design phase.

Design will commence when funding becomes available. SEMCOG has included the project in their 2030 *Regional Transportation Plan* for construction in the period 2011 to 2015. When design is complete, right-of-way acquisition begins. When right-of-way acquisition is completed, the project will proceed to construction. Construction will take several years and will be a function of available funding. At this time, no construction funding has been identified.

SECTION 7

LIST OF PREPARERS

Michigan Department of Transportation

Sue Datta, AICP, Project Manager, B.S., and M.S. in Urban Planning, Michigan State University and Wayne State University. Twelve years of experience in environmental, urban and regional planning.

Andrew J. Zeigler, RLA, Metro Region Planning Manager, B.S. in Landscape Architecture, Michigan State University. Thirty-four years of land use planning and environmental experience. Review of project development and documentation.

Lori Noblet, Transportation Planning Specialist, B.S. in Political Science, University of Wyoming; M.U.P. in Urban Planning, Michigan State University. Seventeen years of experience in preparing environmental assessments and impact statements. Environmental Review Coordinator.

Imad Gedaoun, P.E., Traffic and Safety Supervisor, B.S. in Civil Engineering. Seventeen years of experience in civil engineering. Traffic, safety and geometrics review for the project.

James Schultz, P.E., MITSC Manager, M.S. in Civil Engineering, Wayne State University. Thirty-three years of experience in civil engineering in the public and private sectors. Project development and ITS review.

Larry Wiggins, P.E., Hydraulics/Hydrology Assistant Engineer, B.S. in Civil Engineering, Michigan Technological University. Twenty-nine years of experience at MDOT. Drainage analysis and review.

Christopher Potvin, P.E., Hydraulics/Hydrology Consultant Review Engineer, B.S. in Civil Engineering, Michigan State University. Seven years of experience at the Michigan Department of Environmental Quality (MDEQ) and one year at MDOT. Drainage review.

Brenda Peek, Metro Region Communications Representative, M.A. in Urban Affairs, University of Detroit. Twenty-four years of experience in public information and communications. Communications and public relations.

Robert Owens, Environmental Quality Specialist, B.S. in Biology, University of Arkansas; graduate work in zoology, Ohio State University. Seventeen years with MDOT in wetland analysis and mitigation. Previously thirteen years with the U.S. Fish & Wildlife Service. Wetlands review and mitigation.

Robert Parsons, Public Hearings Officer, B.S. in Interpersonal and Public Communications, Central Michigan University. Fifteen years of experience in communications at MDOT. Coordination of public involvement.

Other MDOT Personnel Assigned to this Project:

Ron Katch, Traffic Review
Tom Zurburg, Noise Analysis Review
Frank Spica, Noise Analysis Review
Eric Dhanak, Geometric and Crash Analysis Review
Geraldyn Ayers, Environmental Supervisor
Dave Ruggles, Archaeological Review
Tom Hanf, Noise Analysis Review
Dave Schuen, Threatened and Endangered Species Review
Bill Swagler, Right of Way Estimate
Kelly Ramirez, Conceptual Stage Relocation Plan
Lloyd Baldwin, Cultural Resources Review
Alex Sanchez, MDEQ Review
Michael Anglebrandt, Project Area Contamination Survey Review
Doug Proper, Mitigation Follow-up

Consultant Team

The consultants performing the analysis for this environmental document have no financial or other interest in the project or its outcome.

Joseph C. Corradino, P.E., Project Manager, The Corradino Group. B.C.E. Villanova University; M.S.C.E., Purdue University. Thirty-nine years of project management and environmental experience. Quality control on EIS.

Ari Adler, Public Involvement, The Corradino Group. B.A. Michigan State University. Fourteen years experience in public involvement and media relations. Coordination with MDOT public hearing officer and public involvement team.

Jim Hartman, P.E., Traffic Projections and Analysis, The Corradino Group. B.S.C.E, Michigan State University. Thirteen years of experience in civil engineering planning with emphasis on traffic analysis. Crash Analysis and Traffic Report.

Ted Stone, Environmental Manager, The Corradino Group. B.A. Northwestern University. Thirty-two years experience in preparation of environmental documentation. Principal author of the EIS, Noise Report, and Air Quality Technical Report.

William Zipp, P.E, Lead Road Engineer, Orchard, Hiltz & McCliment. B.S.C.E., Michigan Technological University. Twenty-five years of civil and roadway design experience. Engineering Report.

Ken Wells, P.E., Road Engineer, Rowe, Inc. B.S.C.E. Michigan State University. Fifteen years of civil, roadway, and drainage design experience. Engineering Report.

C. Stephan Demeter, Senior Historical Archaeologist/Principal Investigator, Commonwealth Cultural Resources Group. B.A. Anthropology and History Wayne State University; M.A Anthropology, Wayne State University. Thirty-one years performing historic resource surveys. Phase I Archaeology Survey and Phase I Above-Ground Survey.

John Freeland, Ph.D., PWS, Wetland Analysis, Tilton and Associates, Inc. B.S. Grand Valley State University; M.S. University of New Hampshire; Ph.D. North Dakota State University. Fifteen years of wetland and integrated resource assessment. Wetlands Report.

Deborah Schutt, Socioeconomic Analysis, Schutt and Company; B.A. Valparaiso University; M.S. Urban Planning Wayne State University. Twenty-seven years of management and planning experience.

Gnanadesikan Ramanujam, P.E. (Ram), Geotechnical Analysis, SOMAT Engineering. M.S. in Civil Engineering, Vanderbilt University, Nashville, Tennessee. Fourteen years experience in geotechnical engineering. Manager of geotechnical analysis.

SECTION 8

DISTRIBUTION LIST

The following is a list of agencies, organizations, and persons to whom the DEIS was sent:

Federal Agencies

Environmental Protection Agency, Administrator, Washington, D.C.
Environmental Protection Agency, Region V
National Park Service
Natural Resources Conservation Service
U.S. Department of Agriculture, Natural Resource Conservation Service
U.S. Department of Commerce, Environmental Affairs
U.S. Department of Housing and Urban Development, Area Director
U.S. Department of the Interior, Fish & Wildlife Service
U.S. Department of Transportation, Federal Transit Administration
U.S. Department of Energy, Washington Office
U.S. Department of Health & Human Services, Center for Disease Control

State Agencies

Michigan Department of Agriculture
Michigan Department of Community Health
Michigan Department of Environmental Quality
Michigan Department of Natural Resources
Michigan Department of State, State Historic Preservation Office

Local Jurisdictions, Agencies, Interested Groups, and Elected Officials

Clean Water Action, Michigan
Michigan Environmental Council
Michigan United Conservation Clubs, Inc.
Sierra Club
Traffic Improvement Association of Oakland County
Auburn Hills
Bloomfield Township
Detroit
Ferndale
Hazel Park
Madison Heights
Royal Oak
Troy
Oakland County
Oakland County Conservation District
Oakland County Drain Commission
Oakland County Emergency Management
Oakland County Health Department
Oakland County Sheriff's Department
Oakland County Soil Conservation District

Road Commission for Oakland County
Southeast Michigan Council of Governments
SMART
Wayne County Department of Public Services
State Senator Michael D. Bishop, District 12
State Senator Shirley Johnson, District 13
State Senator Gilda Z. Jacobs, District 14
State Representative David T. Woodward, District 26
State Representative Andy Meisner, District 27
State Representative Clarence Phillips, District 29
State Representative Shelly Goodman Taub, District 40
State Representative John G. Pappageorge, District 41
U.S. Senator Carl Levin
U.S. Senator Debbie Stabenow
U.S. Representative Joe Knollenberg
U.S. Representative Sander Levin

All of the above will all receive a copy of the FEIS. In addition there were a number of groups and individuals who made substantive comments on the DEIS who will also receive copies of the FEIS.

Transit Riders United
MichiVan Commuter Vanpools
Royal Oak Association of Neighborhoods

Appendix A
Existing Bridge Information

**I-75 Bridges with Clear Widths
M-102 to South Boulevard**

Structure Number	Bridge Location	Year Constructed/ Repaired	Overall Bridge Rating	Vertical Clearance Rating	I-75 Over or Under	I-75 Clear Width NB	I-75 Clear Width SB
S22 of 63174	Meyers Avenue Bridge	1966	Fair	Fair	Under	72	72
S23 of 63174	One-Way Cross-Over for SB to NB Service Drive	1966	Poor	Fair	Under	72	72
S24 of 63174	John R. Bridge	1966	Fair	Fair	Under	72	71
S25 of 63174	One-Way Cross-Over for NB to SB Service Drive	1966	Fair	Good	Under	72	72
S26 of 63174	One-Way Cross-Over for SB to NB Service Drive	1966	Poor	Good	Under	72	72
S27 of 63174	9 Mile Road Bridge	1966	Fair	Fair	Under	72	72
S28 of 63174	Woodward Heights Boulevard Bridge	1971	Fair	Good	Under	79	79
S04 of 63103	Two-Way Cross-Over at W. Shelvin –	1971/1999/2001	Good	Good	Under	110	91
S05 of 63103	I-696 Bridge over I-75	1971	Fair	Poor	Under	67	67
S06-1 and S06-2 of 63103	Two-Way Cross-Over at Dallas Ave.-	1971	Fair	Good	Under	115	95
S30 of 63174	Lincoln Avenue (10 ½ Mile Road) Bridge	1971/1999	Good	Good	Under	79	79
S31 of 63174	11 Mile Road Bridge	1966/1999	Good	Good	Under	60	60
S01 of 63174	Gardenia Avenue Bridge	1963/1996	Good	Good	Under	60	60
S02 of 63174	NB Stevenson Bridge	1963/1999	Good	Good	Under	66	66
S03-1 and S03-2 of 63174	I-75 Bridge over 12 Mile Road	1963/2001	Good	Poor	Over	58	58
S04-1 and S04-2 of 63174	I-75 over 13 Mile Road	1963/1991	Good	Good	Over	54	54
S05-1 and S05-2 of 63174	I-75 over 14 Mile Road	1963/1970	Poor	Poor	Over	63	63
S21-1 and S21-2 of 63174	I-75 over 15 Mile Road (Maple Road)	1963	Fair	Good	Over	50	50
S06-1 and S06-2 of 63174	I-75 over M-150 (Rochester Road)	1964	Poor	Poor	Over	56	56
S08-1 and S08-2 of 63174	I-75 over Livernois Road	1964	Fair	Fair	Over	54	50
S09-1 and S09-2 of 63174	I-75 over Big Beaver Road	1964, 1983	Fair	Good	Over	56	52
S09-5 and S09-6 of 63174	I-75CD over Big Beaver Road	1964, 1983	Fair	Good	Over	47	46
S10 of 63174	Wattles Road (17 Mile) over I-75	1964 ^a	Fair	Poor	Under	70	70
S11-1 and S11-2 of 63174	I-75 over Long Lake Road	1964	Fair	Poor	Over	54	54
S14-1 and S14-2 of 63174	I-75 over Coolidge Road	1964	Fair	Good	Over	52	52
S15-1 and S15-2 of 63174	I-75 over Square Lake Road	1964/2001	Good	Poor	Over	55	55
S16-1 and S16-2 of 63174	I-75 over Adams Road	1964/2001	Good	Fair	Over	55	55
S17 of 63174	Squirrel Road over I-75	1964 ^a	Poor	Fair	Under	90	90
S18-0 and S18-5 of 63174	I-75 BL Ramp and SB O Ramp	1964, 1964/1988	Poor	Good	Over	33	48
S19 of 63174	South Boulevard over I-75	2001	Fair	Fair	Under	115	110

Source: MDOT Bridge Ratings

^aField review indicates that the bridge has been reconstructed.

Note: Where I-75 is under, clear width is defined as the distance between the median pier and adjacent substructure unit (abutment or pier).

Where I-75 is over, clear width is defined as the distance from parapet to parapet.

I-75 Bridge Information

Structure Number	Bridge Location	Year Constructed/ Reconstructed	Overall Bridge Rating	Vertical Clearance Rating	Utilities	Deficient Features	Recommended Action
P02 of 63174	Pedestrian Overpass at E. Bernhard	1966	fair	poor	NA	SPAN LENGTH	NEW BRIDGE
S22 of 63174	Meyers Ave. Bridge	1966	fair	fair	yes	SPAN LENGTH	NEW BRIDGE
P03 of 63174	Pedestrian Overpass at East Harry	1966	fair	poor	NA	SPAN LENGTH	NEW BRIDGE
P04 of 63174	Pedestrian Overpass at Highland Ave.	1966	fair	poor	NA	SPAN LENGTH	NEW BRIDGE
S24 of 63174	John R. Bridge	1966	fair	fair	yes	SPAN LENGTH	NEW BRIDGE
S25 of 63174	One-Way Cross-Over for NB to SB Service Dr.	1966	fair	fair	yes	SPAN LENGTH	NEW BRIDGE
S26 of 63174	One-Way Cross-Over for SB to NB Service Dr.	1966	poor	fair	yes	SPAN LENGTH	NEW BRIDGE
S27 of 63174	9 Mile Road Bridge	1966	fair	fair	yes	SPAN LENGTH	NEW BRIDGE
S23 of 63174	One-Way Cross-Over for SB to NB Service Dr.	1966	poor	fair	yes	SPAN LENGTH	NEW BRIDGE
P06 of 63174	Pedestrian Overpass at Orchard St.	1966	poor	poor	NA	SPAN LENGTH	NEW BRIDGE
S28 of 63174	Woodward Heights Blvd. Bridge	1971	fair	fair	yes	SPAN LENGTH	NEW BRIDGE
P05 of 63174	Pedestrian Over-Pass at W. Browning	1969	fair	poor	NA	SPAN LENGTH	NEW BRIDGE
S04 of 63103	Two-Way Cross-Over at W. Shelvin- NB to SB and SB to NB	1971/1999	good	fair	NA	SPAN LENGTH	NEW BRIDGE
S01 of 63103	Structures of I-75/696 Interchange	1982	fair	poor	NA	NONE	NONE
S02 of 63103	Structures of I-75/696 Interchange	1982	fair	good	NA	NONE	NONE
S03 of 63103	Structures of I-75/696 Interchange	1982	good	poor	NA	NONE	NONE
S05 of 63103	696 Bridge over I-75	1971	good	fair	NA	NONE	NONE
S07 of 63103	Structures of I-75/696 Interchange	1971	good	poor	NA	NONE	NONE
S08 of 63103	Structures of I-75/696 Interchange	1971	poor	poor	NA	NONE	NONE
S09 of 63103	Structures of I-75/696 Interchange	1971	fair	poor	NA	NONE	NONE
S06-1 and S06-2 of 63103	Two-Way Cross-Over at Dallas Ave.- NB to SB and SB to NB	1971	fair	good	NA	SPAN LENGTH	NEW BRIDGE
S30 of 63174	Lincoln Ave. (10 1/2 Mile Road) Bridge	1971/1999	good	good	yes	SPAN LENGTH	NEW BRIDGE

I-75 Bridge Information (continued)

Structure Number	Bridge Location	Year Constructed/ Reconstructed	Overall Bridge Rating	Vertical Clearance Rating	Utilities	Deficient Features	Recommended Action
S31 of 63174	I1 Mile Road Bridge	1966	good	good	yes	SPAN LENGTH	NEW BRIDGE
S01 of 63174	Gardenia Ave. Bridge	1963	poor	good	yes	SPAN LENGTH	NEW BRIDGE
S02 of 63174	NB Stevenson Bridge	1963/1999	poor	good	no	SPAN LENGTH	NEW BRIDGE
P01 of 63174	Pedestrian Over-Pass at Bellaire Ave.	1963	fair	poor	NA	SPAN LENGTH	NEW BRIDGE
S03-1 and S03-2 of 63174	I-75 Bridge over 12 Mile	1963/2001	poor	poor	NA	Under Capacity	NEW BRIDGE/INTERCHANGE
B02-1 and B02-2 of 63174	I-75 NB and SB over Red Run Drain in Madison Heights	1963/2001	fair	NA	NA	# of LANES	WIDEN to INSIDE
P07 of 63174	Wattles Rd Pedestrian over I-75	1983	good	good	NA	NONE	NONE
S04-1 and S04-2 of 63174	I-75 NB & SB over 13 Mile Rd	1963/1991	poor	poor	NA	# of LANES	WIDEN to INSIDE
S05-1 and S05-2 of 63174	I-75 NB & SB over 14 Mile Rd	1963/1970	fair	poor	NA	Under Capacity	NEW BRIDGE/INTERCHANGE
S06-1 and S06-2 of 63174	I-75 NB & SB over M-150	1964	fair	poor	NA	# of LANES	WIDEN to INSIDE
S08-1 and S08-2 of 63174	I-75 NB & SB over Livernois Rd	1964	poor	poor	NA	# of LANES	WIDEN to INSIDE
S09-5 and S09-6 of 63174	I-75 NB, SB, NB CD, & SB CD over Big Beaver Rd	1964, 1983	fair	poor	NA	# of LANES	WIDEN to INSIDE
S10 of 63174	Wattles Rd over I-75	1964	fair	poor	NA	NONE	NONE
S11-1 and S11-2 of 63174	I-75 NB & SB over East Long Lake Rd	1964	fair	poor	NA	NONE	NONE
S12 of 63174	Ramp Connector to Chrysler over I-75	1964	fair	good	NA	# of LANES	WIDEN to INSIDE
S13 of 63174	Crooks Rd over I-75	1990	good	good	NA	NONE	NONE
S32 of 63174	SB Crooks Rd over I-75	1990	good	good	NA	NONE	NONE
S14-1 and S14-2 of 63174	I-75 NB & SB over Coolidge Rd	1964	fair	poor	NA	NONE	NONE
S15-1 and S15-2 of 63174	I-75 NB & SB over Square Lake Rd	1964/2001	good	poor	NA	# of LANES	WIDEN to INSIDE
S16-1 and S16-2 of 63174	I-75 NB & SB over Adams Rd	1964/2001	good	poor	NA	# of LANES	WIDEN to INSIDE
S17 of 63174	Squirrel Rd over I-75	1964	poor	fair	NA	# of LANES	WIDEN to INSIDE
S18-0 and S18-5 of 63174	I-75 BL Ramp and SB O Ramp	1964, 1964/1988	fair	good	NA	# of LANES	WIDEN to INSIDE
S19 of 63174	South Blvd over I-75	1964/2001	fair	fair	NA	# of LANES	WIDEN to INSIDE
S20 of 63174	I-75 NB & SB over Auburn Rd	1964/1988	good	poor	NA	SPAN LENGTH	NEW BRIDGE
S21-1 and S21-2 of 63174	I-75 NB & SB over 15 Mile Rd (Maple Rd)	1963	fair	poor	NA	NONE	NONE
B04-1 and B04-2 of 63174	I-75 NB & SB over Clinton River 0.6 miles south of M-59	1964/2001	good	NA	NA	NONE	NONE
S01-1 and S01-2 of 63172	I-75 NB & SB over M-59	1963/1988	poor	poor	NA	N/A	N/A

Appendix B
Conceptual Stage Relocation Plan

Michigan Department of Transportation
Real Estate Support Area
Conceptual Stage Relocation Plan - Revised
I-75 EPE Corridor Study
Control Section 63174, Job Number 55776

December 14, 2004

The Conceptual Stage Relocation Plan for this Final EIS has been revised to reflect a modification of the braiding of ramps in the northeast quadrant of the interchange of I-75 with I-696 due to comments received from the cities of Royal Oak and Madison Heights.

GENERAL AREA AND PROJECT INFORMATION

As with the original Conceptual Stage Relocation Plan, the proposed I-75 project extends eighteen miles along I-75 from 8 Mile Road to M-59 in Oakland County, Michigan. The purpose of the proposed project is to increase the capacity of the transportation infrastructure in the I-75 corridor to meet travel demand for personal mobility and goods movement. The proposed alternatives would add a through travel lane, so that four lanes are provided in each direction over the project length.

The general area of the proposed project consists of a mixture of residential, commercial and industrial land uses, with a small amount of vacant land.

DISPLACEMENTS

26 single family residential
2 businesses
1 non-profit organization (church)

DISPLACEMENT EFFECTS AND ANALYSIS

Property acquired for this project will be purchased in segments or phases, providing for the efficient and complete relocation of all eligible displaced residents, businesses and nonprofit organizations impacted by the project. Completing the project in phases will allow an adequate period of time for the relocation process and ensure the availability of a sufficient number of replacement properties in the local area for all eligible displacees.

Residential: The project may cause the displacement of approximately 26 single family residential units. A study of the housing market in the project area indicates a sufficient number of replacement homes and rentals will be available throughout the relocation

cc: Susan
Paul
Project file

process. It is anticipated that the local residential real estate market will have the capacity to absorb the residential displacements impacted by this project.

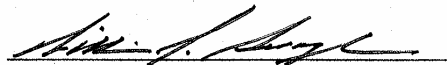
Business: The project may cause the displacement of approximately 2 businesses. A review of the local commercial real estate market indicates that there are a sufficient number of replacement sites available to relocate eligible displaced businesses. Displacement of these businesses is not expected to have a major economic or otherwise generally disruptive effect on the community by this project.

Non-Profit Organizations: The project may cause the displacement of approximately 1 non-profit organization. A review of the local commercial real estate market indicates that there is an adequate supply of properties available as replacement sites for eligible non-profit organizations.

ASSURANCES

The acquiring agency will offer assistance to all eligible residents, businesses, farms and nonprofit organizations impacted by the project, including persons requiring special services and assistance. The agency's relocation program will provide such services in accordance with Act 31, Michigan P.A. 1970; Act 227, Michigan P.A. 1972; Act 87, Michigan P.A. 1980, as amended, and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform act), as amended. The acquiring agency's relocation program is realistic and will provide for the orderly, timely and efficient relocation of all eligible persons in compliance with state and federal guidelines.

Prepared by:



Date: 12.14.2014

Appendix C

Scoping and Correspondence

Section 1

Notice of Intent to Prepare an Environmental Impact Statement – June 14, 2002

Section 2

List of Those Invited to Scoping Meetings August 29, 2002

Section 3

Minutes of Scoping Meetings

Section 4

Agency Correspondence in Response to Scoping

Appendix C - Section 1

Notice of Intent to Prepare an Environmental Impact Statement – June 14, 2002

[4910-22]

1 DEPARTMENT OF TRANSPORTATION

Federal Highway Administration

2 ENVIRONMENTAL IMPACT STATEMENT: OAKLAND COUNTY, MICHIGAN

AGENCY: Federal Highway Administration (FHWA), DOT.

ACTION: Notice of Intent.

3 SUMMARY: The FHWA is issuing this notice to advise the public that an environmental impact statement will be prepared for the I-75 Oakland County Planning/Environmental Study.

FOR FURTHER INFORMATION CONTACT: James A. Kirschensteiner, Assistant Division Administrator, Federal Highway Administration, 315 West Allegan Street, Room 207, Lansing, Michigan 48933, Telephone: (517) 702-1835, Fax: 377-1804, email james.kirschensteiner@fhwa.dot.gov

SUPPLEMENTARY INFORMATION: The FHWA, in cooperation with the Michigan Department of Transportation, will prepare an environmental impact statement (EIS) on a proposal to add an additional through travel lane in each direction on I-75 between 8-Mile Road and M-59 to bring the total number of through travel lanes to four in each direction, together with other improvements. Improvements are considered necessary to provide for improved travel on I-75, which is already highly congested through much of the day. The EIS will include the evaluation of recommendations from the previous I-75 Corridor Feasibility Study (November 2000), including a thorough analysis of transit alternatives utilizing the Southeast Michigan Council of Governments (SEMCOG) Transit Vision and the 1999 Southeast Michigan High Occupancy Vehicle (HOV) Feasibility Study. The Feasibility Study recommended the addition of a fourth lane in those areas where it is needed to provide four through lanes, improving several interchanges, and implementing intelligent transportation systems (ITS) throughout the corridor. Alternatives under consideration include (1) taking no action; (2) providing mass transit; (3) implementing transportation system management and/or transportation demand management techniques; (4) developing the proposed lanes for use either all day or during a portion of the day by high occupancy vehicles (carpools, vanpool, and buses) only; and, (5) developing normal, unrestricted freeway travel lanes.

Letters describing the proposed action and soliciting comments will be sent to appropriate federal, state, and local agencies, and to private organizations and citizens who have previously expressed or are known to have an interest in this proposal. Five rounds of public meetings were held during the Feasibility Study phase during 1999 and 2000. Additional meetings and a public hearing are planned. Public notice will be given of the time and place of the hearing(s). The draft EIS will be available for public and agency review and comment prior to the public hearing. No formal scoping meeting is planned at this time.

To ensure that the full range of issues related to this proposed action are addressed and all significant issues identified, comments and suggestions are invited from all interested parties. Comments or questions concerning this proposed action and the EIS should be directed to the FHWA at the address provided above. (Catalog of Federal Domestic Assistance Program Number 20.205, Highway Planning and Construction. The regulations implementing Executive Order 12372 regarding intergovernmental consultation of Federal programs and activities apply to this program.)

James J. Steele
Division Administrator
Lansing, Michigan

[FR Doc. 02-15085 Filed 6-13-02; 8:45 am]

Appendix C - Section 2

List of Those Invited to Scoping Meetings August 29, 2002

The following federal, state, and local agencies and offices were sent scoping information packets for the proposed I-75 project from M-102 (8 Mile Road) to M-59 in Oakland County. Those who attended and those who responded to the scoping materials are noted in the list that follows.

FEDERAL AGENCIES

Mr. Lester Berman, Environmental Officer
US Depart. of Housing and Urban Development

Craig Czarnecki, Field Supervisor - **Responded**
United States Department of the Interior
Fish and Wildlife Service

Mr. Joel Ettinger, Regional Administrator
Federal Transit Administration

Mr. Gary Mannesto, Chief - **Responded**
Regulatory Office
Department of the Army
Detroit District, Corps of Engineers

Mr. William Schenk, Regional Director
National Park Service, Midwest Region

Mr. Kenneth A. Westlake, Chief – **Attended** (Sherry
Kamke)
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis
United States Environmental Protection Agency,
Region 5

Mr. Ronald C. Williams,
State Conservationist
Natural Resources Conservation Service
Michigan State Office

STATE AGENCIES

Mr. George Burgoyne - **Responded**
Resource Management Deputy
Dept. of Natural Resources

Mr. Brian Conway – **Responded**
State Historic Preservation Officer
Michigan Dept. of History, Arts and Libraries

Mr. Gerald Fulcher - **Attended (Alex Sanchez)**
Geological and Land Water Mgt. Division
Dept. of Environmental Quality

Mr. G. Vincent Hellwig
Division Chief
Air Quality Division
Dept. of Environmental Quality

Ms. Carol Isaacs, Director
Health Legislation & Policy Development
Michigan Department of Community Health

Ms. Teresa Seidel, District Supervisor
Southeast Michigan District Office
Dept. of Environmental Quality

Mr. Dan Wyant, Director - **Responded**
Michigan Department of Agriculture

LOCAL AGENCIES

Mr. Gary Ahol
Oakland County Drain Commission

Mr. Brent Bair – **Attended** (Gerald Holmberg)
Responded
Road Commission of Oakland County

Ms. Claudia Berry
Chamber of Commerce

Mr. Michael Brouchard, Sheriff
Oakland Co. Sheriff Department

Hon. Ralph Castelli, Jr., Mayor
City of Pleasant Ridge

Hon. Ben Colley, Mayor
City of Hazel Park

Mr. Joseph Cozma – **Attended** (Eugene
Snowden)
Oakland Co. Drain Commission

Hon. John Davey, Mayor
City of Bloomfield Hills

Mr. Dan Dirks – **Attended** (Ron Ristau)
General Manager
SMART

Hon. George Frisch, Mayor
City of Lake Angelus

Hon. Ronald F. Gillham, Mayor
City of Huntington Woods

Mr. Ron Grimes, Supervisor
Environmental Health
Oakland Co. Health Dept.

Hon. Mari Harvey-Edwards, Mayor
City of Auburn Hills

Ms. Carolyn Henney
Oakland Co. Soil Conservation District

Hon. Barbara L. Iseppi, Mayor
City of Clawson

Hon. David Katulic, Mayor
City of Rochester

Hon. Kwame Kilpatrick, Mayor – **Attended**
(Sarah Lile)
City of Detroit

Mr. Robert Long, Chairman
Oakland Co. Conservation District

Hon. Dianne McKeon, Mayor
City of Birmingham

Hon. John Mark Mooney, Mayor
City of Berkley

Hon. Gerald E. Naftaly, Mayor
City of Oak Park

Mr. Gail Novak, Chief
Oakland Co. Emergency Management

Mr. Carmine Palombo, Director – **Attended**
Transportation Programs, SEMCOG

Hon. Willie Payne, Mayor – **Attended** (Art
Mitchell)
City of Pontiac

Hon. Robert Porter, Mayor – **Attended** (Tom
Barwin)
City of Ferndale

Hon. Matt Pryor, Mayor – **Attended**
City of Troy

Mr. Phil Sanzica
Asst. Chief Engineer
Oakland Co. Drain Commission, Construction

Hon. Patricia Somerville, Mayor – **Attended**
(Paul Davis)
City of Rochester Hills

Hon. Edward Swanson, Mayor – **Attended**
City of Madison Heights

Mr. J. David Vanderveen - **Attended**
Oakland County

Hon. Bill Urich, Mayor – **Attended** (Dick Cole)
City of Royal Oak

STATE AND U.S. SENATORS AND REPRESENTATIVES

Hon. Michael D. Bishop
State Representative

Hon. Mike Kowall
State Representative

Hon. Mat J. Dunaskiss
State Senator

Hon. Carl Levin
U.S. Senator

Hon. Patricia A.K. Godchaux
State Representative

Hon. Sander Levin
U.S. Representative

Hon. Robert Gosselin - **Attended**
State Representative

Hon. John G. Pappageorge
State Representative

Hon. Gilda Z. Jacobs
State Representative

Hon. Gary Peters
State Senator

Hon. Ruth A. Johnson
State Representative

Hon. Clarence Phillips
State Representative

Hon. Shirley Johnson
State Senator

Hon. Debbie Stabenow
U.S. Senator

Hon. Dale E. Kildee
U.S. Representative

Hon. David T. Woodward
State Representative

Hon. Joe Knollenberg
U.S. Representative

OTHER AGENCIES

Ms. Dusty Fancher
Land Programs Director
Michigan Environmental Council

Mr. James Goodheart
Executive Director
Michigan United Conservation Clubs, Inc.

Mr. Keith G. Harrison
Executive Director
Michigan Environmental Science Board

Ms. Allison Horton
Director
Sierra Club
Mackinac Chapter

Ms. Bethany Renfer
Program Coordinator
Clean Water Action

Appendix C - Section 3

Minutes of Scoping Meetings

**I-75 Oakland County Planning/Environmental Study
Scoping Meeting
August 29, 2002
Troy Library – 9:30 a.m.**

Background: Scoping allows agencies to become familiar with a project and voice preliminary concerns about the purpose and need for a project, the alternatives to be considered, the likelihood and nature of impacts, and the methodologies to be used in the course of analysis.

Purpose: To solicit comment of regulatory agencies.

Attendance: See attached list.

Discussion:

Dave Wresinski chaired the meeting. First, those present were asked to introduce themselves. Several comments were made in the course of these introductions as those present indicated why they were there. For example, Tom Barwin of Ferndale emphasized the need to examine long-range land use planning for the region, noting the current lack of such a plan.

Following introductions, Jim Kirschensteiner reviewed the federal process that guides development of an Environmental Impact Statement (EIS). He noted the EIS process attempts to reach consensus but acknowledged that consensus was not always achieved. Then, Joe Corradino reviewed the project background and established the basis upon which further discussion could be undertaken, including the following:

- C. Tom Barwin asked that a survey be performed of people within a thousand feet of the interstate corridor to determine whether asthma was more prevalent in this corridor.
- R. Joe Corradino indicated while such a survey was not part of the project, zip-code based data could be gathered from the Michigan Department of Community Health on asthma conditions in Oakland County. Joe Corradino also noted air toxics would be covered as much as EPA has information on that subject. He also said that the indirect (secondary) and cumulative impact analysis would look at population shifts. Regarding land use, he noted that SEMCOG's data are a buildup of population and employment drawn from the constituent members of SEMCOG.
- C. Tom Barwin noted that housing at the north end of the corridor was in the high-end of the market and the result was an effective trapping of the poor in the inner suburbs.
- R. Jim Kirschensteiner noted that the environmental justice analysis would cover such socioeconomic issues.

- C. Dennis Toffolo of Oakland County Economic Development noted that trucks needed to be moving, not at idle, and they would be both more productive and less polluting when they were moving on an improved I-75.
- C. Tom Barwin stated that I-75 over the last 30 years had been a conduit for the inner suburbs to lose population.
- C. Mayor Matt Pryor of Troy said it was a waste of money to study HOV; that that decision could be made here and now. He suggested the best course was to study only those alternatives that could legitimately be implemented.
- R. Joe Corradino responded that to ensure the viability of the study, and the underlying NEPA process, it was necessary to do an adequate analysis of HOV. He noted that the next step in the HOV assessment should be concluded within a matter of six weeks. The HOV analysis would be performed by examining the modification of the interchanges at I-696 and M-59, plus other interchanges as well as the I-75 mainline.
- C. Karen Kendrick-Hands indicated some communities have no transit service, so, if the analysis relied on the transit system in its current configuration, ridership would be understated.
- R. Joe Corradino responded that today's condition was not what was being examined. Future conditions include an expanded bus transit network, as well as the rapid transit system along Woodward Avenue.
- C. Tom Barwin asked whether the transit analysis tested increased densities around rail stations to reflect the experience of other communities around the nation.
- R. Joe Corradino responded that was not done but indicated that the computer model likely over predicts ridership, because it assumes transit characteristics, like frequency of service and travel speeds that are very optimistic. This has the effect of counterbalancing the lack of increased density that would occur over time.
- C. Jim Schultz of the MITS Center noted that a massive signal retiming program was underway in Oakland County that would have benefits for I-75 and travel generally throughout the region.
- C. Ms. Hands made several additional points: 1) transit in a regional sense is never acknowledged in individual highway projects; 2) the major dollars involved in individual highway projects together had a cumulative cost that was very high and that transit might serve as an alternative at a much lower price; 3) transit had not been mentioned as a potential mitigating factor during construction of an improved I-75; 4) it was implicit in the I-75 EIS analysis that extensive improvements would need to be made to the alternative arterial grid system; 5) the environmental cost savings of transit should be compared to the highway construction cost; and, 6) the effects of the M-59 interchange should be incorporated into the I-75 project.
- R. Jim Kirschensteiner responded to the last point, indicating that the M-59 interchange had received environmental clearance in 1988 and that it had been reevaluated recently. Joe Corradino responded to the remark about transit use during construction, noting that it will be covered in the analysis, and that the effects on arterials would be covered under indirect (secondary) and cumulative

impacts, for those roads where there was a 10 percent change in traffic volumes due to improving I-75. Greg Johnson added that MDOT cannot stand by and watch its roads further deteriorate.

- C. Ms. Hands indicated that level-of-service shouldn't be the only measure of effectiveness used in the evaluation.
- C. Dave Vanderveen stated that, generally, "highway dollars" were used for highway projects and "transit dollars" for transit projects so that, to some degree, the issue of financing was unique to each mode. Ms. Hands indicated that there is some flexibility in shifting Surface Transportation Program funds.
- R. Joe Corradino indicated that such shifts rely on reaching a regional decision to do so.
- C. Robin Beltramini, Councilwoman from Troy, urged that the process should move forward.
- C. Carmine Palombo from SEMCOG noted misstatements with respect to the cost of some projects. He stated that there was about a \$17 billion shortfall with respect to projects in the adopted transportation plan. Further, there was a \$1.4 billion placeholder in Southeast Michigan for proposed I-94 improvements. About 24 to 26 studies are underway and SEMCOG was working with MDOT on priorities for these projects. I-75 is one of these. Transit and ITS need funding as well. He stressed that transit should be considered seriously as a mitigation measure during construction and noted that SEMCOG's ridesharing office would certainly be involved in efforts during construction.
- C. The Road Commission for Oakland County indicated that it was waiting to see the results of the study.
- C. The Drain Office of Oakland County indicated it would comment on engineering plans once work was further along.
- R. Joe Corradino noted that a special study would be performed to develop drainage strategies that would be reviewed at a later date by the Drain Office.
- C. Dennis Toffolo indicated his concern was that factual information be brought forward and studied.
- C. John Austin of Madison Heights indicated he would like to see a full analysis of economic impacts of the HOV lanes. He further commented that he didn't know where park-and-ride lots could be built.
- R. Joe Corradino responded that the economic impact analysis requested would be performed only if the HOV lanes were carried forward as a practical alternative.
- C. Sherry Kamke of EPA said that typically, in a meeting like this, one would look at the purpose and need and alternatives and that EPA's primary interest was on natural resources, air quality, water quality, and the like. EPA is concerned about the effects of diesel on special groups. Nevertheless, she noted that a causal relationship had not been established between diesel pollution and asthma. She further indicated she believed that the analysis to date of transit and HOV

appeared to be appropriate and that it was also appropriate to carry transit forward as part of the vision process. She noted further that, from the perspective of EPA, transit was a metro-wide issue.

- C. Carmine Palombo of SEMCOG indicated that it was likely that SEMCOG would work with the area's congressional delegation to seek federal dollars for an alternative analysis of rapid transit in the Woodward corridor.
- C. Alex Sanchez of the Michigan Department of Environmental Quality said his agency's concerns related to water and air quality and the effects on natural resources.
- C. Ron Ristau of SMART indicated that SMART generally agreed with the results of the model with respect to transit, but had some concerns about ridership in the 15-Mile Road area.
- R. Joe Corradino responded that The Corradino Group would take a second look in that area.
- C. Jim Kirschensteiner noted that as the I-75 project moves forward, it will have to be incorporated into a fiscally constrained long-range plan and that air quality conformity could not occur until that was accomplished. These two elements were necessary before a Record of Decision could be developed that is required to advance the project to the next step.
- C. A representative of Orion Township indicated he was concerned that I-75 improvements be extended north due to the poor level-of-service being experienced around M-24 and Baldwin Road.
- C. John Abraham of Troy stressed the desire of Troy for noise abatement in residential areas. He also noted that Troy was moving ahead on a number of arterial projects independent of the I-75 project.

The meeting concluded with a request for additional input as participants further studied the scoping document and other products of the I-75 EIS.

Attendance

Name	Representing
Abdel Abdalla	Federal Highway Administration
John Abraham	Troy
Michael J. Allen	Madison Heights
Jon Austin	Madison Heights
Thomas Barwin	City of Ferndale
Robin Beltramini	Troy
Mary Ann Bernardi	Troy resident
Dick Cole	Royal Oak
Joe Corradino	The Corradino Group
Sue Datta	Michigan Department of Transportation
Brenda Peek	Michigan Department of Transportation
Paul Davis	Rochester Hills
Bob DeCorte	Traffic Improvement Association for Oakland County
Steve Demeter	Commonwealth Cultural Resources Group
Jerry Dywasek	Orion Township
Keisha Estwick	Orchard, Hiltz & McCliment
John Freeland	Tilton & Associates
Gerrad Godley	Rowe, Inc.
Bob Gosselin	State Representative
Steve Hinz	Federal Highway Administration
Gerald Holmberg	Road Commission for Oakland County
Linsay Jaiyesis	City of Detroit
Greg Johnson	Michigan Department of Transportation
Wayne Johnson	City of Berkley
Sherry Kamke	US EPA
Sean Kelsch	URS
Karen Kendrick-Hands	TRU
Jim Kirschensteiner	Federal Highway Administration
Sarah Lile	City of Detroit – Environmental Affairs
Art Mitchell	City of Pontiac
Carmine Palombo	SEMCOG
Jayn Page	Madison Heights
Matt Pryor	Mayor of Troy
Ron Ristau	SMART
Alex Sanchez	Michigan Department of Environmental Quality
Jim Schultz	Michigan Department of Transportation
Eugene Snowden	Oakland County Drain Office
Ted Stone	The Corradino Group
Ed Swanson	Madison Heights
Brian Tingley	Schutt & Company
Dennis Toffolo	Oakland County
J. David Vanderveen	Oakland County
Tara Weise	URS
Ken Wells	Rowe, Inc.
David Wresinski	Michigan Department of Transportation
Bill Zipp	Orchard, Hiltz & McCliment

Appendix C - Section 4

Correspondence Received in Response to Scoping

1. August 22, 2002 – Road Commission for Oakland County
2. September 16, 2002 - Michigan Department of Natural Resources, Wildlife Division
3. September 18, 2002 – Michigan Department of Agriculture
4. October 1, 2002 – Michigan Department of State, State Historic Preservation Office
5. October 17, 2002 – US Army Corps of Engineers
6. March 14, 2003 – Michigan Department of Environmental Quality
7. March 21, 2003 – US Department of the Interior, US Fish and Wildlife Service
8. May 14, 2003 – Michigan Department of State, State Historic Preservation Office
9. May 23, 2003 – US Environmental Protection Agency
10. July 2, 2003 – MDOT to Michigan Department of Environmental Quality
11. September 25, 2003 – FHWA to US Environmental Protection Agency
12. September 25, 2003 – FHWA to US Fish & Wildlife Service



Board of Road Commissioners

*Larry P. Crake
Chairman*

*Richard G. Skarriff
Vice-Chairman*

*Rudy D. Lazano
Commissioner*

*Brent O. Bair
Managing Director*

*Gerald M. Holmberg
Deputy Managing Director
County Highway Engineer*

31001 Lahser Road
Beverly Hills, MI
48025

248-645-2000

FAX
248-645-1349

TDD
248-645-9923

www.rcocweb.org

August 22, 2002



Sue Datta, Project Manager
MDOT Metro Region Office
18101 W. Nine Mile Road
Southfield, MI 48075

RE: I-75 EIS

Dear Ms. Datta:

The Road Commission for Oakland County (RCOC) would like to respond in writing to your request for official comments for the EIS being prepared on the I-75 widening project between Eight Mile Road and M-59 in Oakland County. Please include this letter in your Scoping Document for review by the Federal Highway Administration.

First, RCOC supports the effort to widen I-75 to four lanes in each direction through Oakland County. The demand is evident by the volumes on I-75 and the overflow traffic that clogs the local roads in the corridor.

Secondly, we believe the two new lanes should be general-purpose lanes and not high-occupancy-vehicle lanes. We do not believe the extra costs of construction and enforcement of HOV lanes can be justified by the expected use.

Thirdly, the reconstructed interchanges of I-75 at both Twelve Mile and Fourteen Mile roads should use the single point design. We believe that design is more efficient and will function best with our FAST-TRAC signal system.

Finally, there are freeway interchanges with several county roads: Twelve Mile Road, Fourteen Mile Road, Big Beaver Road, Long Lake Road, Crooks Road, and Adams Road. It is essential that design review and collaboration take place with our Engineering/Design staff. If additional right-of-way is required along any of the county roads, consultation is important to ensure the purchased parcels meet the guidelines of our master right-of-way plan, and ultimately end up in the proper hands. Please contact Tom Blust, director of Engineering, for coordination on both issues.



QUALITY LIFE THROUGH GOOD ROADS:
DAD COMMISSION FOR OAKLAND COUNTY
"WE CARE"

Ms. Sue Datta
August 22, 2002
Page 2

Should interchange construction result in work along county roads and require a county permit, please contact Bill McEntee, director of Permits & Environmental Concerns for consultation and procedures.

Thank you for providing this opportunity to offer comments at an early stage on this important project.

Sincerely,

Brent O. Bair
Managing Director

c: Gerald Holmberg
Brian Blaesing
Tom Blust
Bill McEntee

/lb



JOHN ENGLER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF NATURAL RESOURCES
LANSING

September 16, 2002



Ms. Sue Datta
Michigan Department of Transportation
Metro Region Office
18101 West Nine Mile Rd
Southfield, MI 48075

RE: I-75 Improvement Project

Dear Ms. Datta:

The location of the proposed project was checked against known localities for natural features. Unique natural features are recorded in a statewide database. This continuously updated database is a comprehensive source of existing data on Michigan's endangered, threatened, or otherwise significant plant and animal species, natural plant communities, and other natural features. Records in the database indicate that a qualified observer has documented the presence of special natural features at a site. The absence of records in the database for a particular site may mean that the site has not been surveyed. Records are not always up-to-date, and may require verification. In some cases, the only way to obtain a definitive statement on the status of natural features is to have a competent biologist perform a complete field survey.

Under Act 451 of 1994, the Natural Resources and Environmental Protection Act, Part 365, Endangered Species Protection, "a person shall not take, possess, transport, ...fish, plants, and wildlife indigenous to the state and determined to be endangered or threatened," unless first receiving an Endangered Species Permit from the Department of Natural Resources, Wildlife Division. *Responsibility to protect endangered and threatened species is not limited to the list below. Other species may be present that have not been recorded in the database.*

The presence of threatened or endangered species does not preclude activities or development, but may require alterations in the project plan. Special concern species are not protected under endangered species legislation, but recommendations regarding their protection may be provided. Protection of special concern species will help prevent them from declining to the point of being listed as threatened or endangered in the future. If the project is located on or adjacent to wetlands, inland lakes, or streams, additional permits may be required. Contact the Michigan Department of Environmental Quality, Land and Water Management Division, P.O. Box 30473, Lansing, MI 48909 (517-373-1170).

The following is a summary of the results for the project in Oakland County, I-75 from T3N R10E Section 26 south to T1N R11E Section 36:

The project should have no impact on rare or unique natural features at the location specified above if it proceeds according to the plans provided. Please contact me for an evaluation if the project plans are changed.

Thank you for your advance coordination in addressing the protection of Michigan's natural resource heritage. Responses and correspondence can be sent to: Michigan Department of Natural Resources, Wildlife Division – Natural Heritage Program, PO Box 30180, Lansing, MI 48909. If you have further questions, please call me at 517-373-1263.

Sincerely,

Lori G. Sargent
Endangered Species Specialist
Wildlife Division

LGS:kpg



STATE OF MICHIGAN
DEPARTMENT OF AGRICULTURE
LANSING

JOHN ENGLER
GOVERNOR

DAN WYANT
DIRECTOR



September 18, 2002

Sue Datta, Project Manager
MDOT, Metro Region Office
18101 West Nine Mile Road
Southfield, Michigan 48075

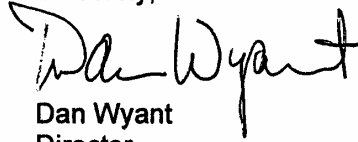
Dear Ms. Datta:

Thank you for the opportunity to comment on this preliminary phase of the planning and environmental study for the proposed widening of an 18-mile section of I-75 between 8 Mile Road and M-59 in Oakland County.

Since the widening of I-75 is to be accomplished largely within the existing right-of-way in a highly developed traffic corridor, little or no adverse impacts to agriculture are anticipated. However, we ask that you contact Mr. John McCulloch, Oakland County Drain Commissioner (phone: 248-858-0958), as you undertake your "drainage study" in order to avoid adverse impacts to established county and inter-county drainage systems.

Again, thank you for the opportunity to comment.

Sincerely,


Dan Wyant
Director

CONSTITUTION HALL • P.O. BOX 30017 • LANSING, MICHIGAN 48909
www.michigan.gov • (517) 373-1104



JOHN ENGLER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES
LANSING

DR. WILLIAM ANDERSON
DIRECTOR

October 1, 2002

MARGARET BARONDESS
MICHIGAN DEPARTMENT OF TRANSPORTATION
425 WEST OTTAWA
PO BOX 30050
LANSING MI 48909

RE: ER-02-293 I-75 Improvements, 8 Mile road to M-59, Oakland County (FHWA)

Dear Ms. Barondeas:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed and approve the parameters determined by MDOT for the area of potential effects (APE) and inventory work for the above-cited project.

The State Historic Preservation Office (SHPO) is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Martha MacFarlane Fees, Environmental Review Coordinator, at (517) 335-2721. Please reference our project number in all communication with this office regarding this undertaking. Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,

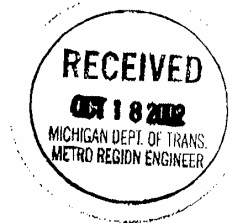
Brian D. Conway
State Historic Preservation Officer

BDC: JRH:ROC:bgg

STATE HISTORIC PRESERVATION OFFICE, MICHIGAN HISTORICAL CENTER
702 WEST KALAMAZOO STREET • P.O. BOX 30740 • LANSING, MICHIGAN 48909-8240
(517) 378-1830
www.michigan.gov/hal



DEPARTMENT OF THE ARMY
DETROIT DISTRICT, CORPS OF ENGINEERS
BOX 1027
DETROIT, MICHIGAN 48231-1027



IN REPLY REFER TO:

OCT 17 2002

Planning Division
Environmental Analysis Branch

Ms. Sue Datta, AICP
Project Manager
Michigan Department of Transportation
Metro Region Office
18101 West Nine Mile Road
Southfield, Michigan 48075

Dear Ms. Datta:

We are writing in response to your August 20, 2002, correspondence on the proposed widening of I-75 between 8 Mile Road and M-59, Oakland County, Michigan. In accordance with our responsibilities, the following comments are provided under our civil works/floodplain management program and our regulatory program.

Our civil works program does not include any current or future plans to develop waterways in the vicinity of your project; however, we are currently involved in designing a segment of the Oakland County Drainage District's Twelve Town Drain Environmental Infrastructure Project. Further coordination would be necessary to determine if the proposed I-75 widening would impact this project. You can contact our project manager, Pat Kuhne, at 313-226-6767 for more information on the Twelve Town Drain project.

Our Floodplain Manager notes that the proposed I-75 widening would involve a number of communities that participate in the Regular Phase of the National Flood Insurance Program (NFIP). Flood elevations for waterways in the project vicinity are delineated on the applicable NFIP Flood Insurance Rate Maps. We recommend that you coordinate the proposed I-75 widening with local officials and with the Michigan Department of Environmental Quality, Land and Water Management Division, Hydraulic Studies Unit (517-335-3181) regarding the applicability of a floodplain permit prior to construction. This coordination would help insure full compliance with local and state floodplain management regulations and acts. If you obtain any information indicating that your project would be impacting a flood plain, you should consider other sites. This would be consistent with current Federal policy to formulate projects that, to the extent possible, avoid or minimize adverse impacts associated with the use of the flood plain.

Our Regulatory Office has reviewed your proposal for regulatory compliance pursuant to Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act. No

activities under the Corps of Engineers' regulatory jurisdiction may commence without prior Corps' authorization. The proposed widening of I-75 between 8 Mile Road and M-59 is outside of our regulatory jurisdiction and, as such, a Department of the Army permit is not required. Please contact the Michigan Department of Environmental Quality, Land and Water Management Division, Permit Consolidation Unit (517-373-9244) for a determination of any state permit requirements. Please note this is a preliminary review and does not represent a comprehensive public interest review such as would occur during a permit application evaluation process.

We appreciate the opportunity to comment upon your project proposal. Any questions regarding our civil works/floodplain management program can be directed to Mr. Charlie Uhlarik, Planning Branch, at 313-226-6753. Questions regarding our regulatory program should be directed to Mr. Robert Tucker, Chief, Enforcement Branch, Regulatory Office, at 313-226-6812 (Reference file 02-263-001-0). Other environmental review questions may be directed to Mr. Paul Allerding at 313-226-7590.

Sincerely,



for

Les E. Weigum
Chief, Environmental Analysis Branch



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

March 14, 2003

Ms. Margaret Barondess, Manager
Environmental Section
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Ms. Barondess:

SUBJECT: I-75 Planning Study in Oakland County- Purpose and Need

We have reviewed the Purpose and Need documentation that was provided in your March 3, 2003, correspondence. As described in the March 2003, Scoping Information Report, the proposed project includes transportation improvements on I-75 between 8 Mile Road and M-59 including the potential for a new forth lane. It is our understanding that a Draft Environmental Impact Statement will be developed to evaluate the proposed alternatives for this project.

The document indicates that the purpose of the project is to:

- 1) Improve travel efficiency and roadway capacity in the I-75 corridor by upgrading, where feasible, road segments, interchanges, and bridges to modern standards and making other transportation improvements (including the use of Intelligent Transportation Systems) designed to accommodate projected year 2025 traffic volumes.
- 2) Improve the physical condition of existing bridges and road segments.
- 3) Improve motorist safety.

Under the National Environmental Policy Act and the Section 404 regulatory process we agree with the first concurrence point as to the purpose and need for the project investigation to continue. We have the following comment:

- Table 2-3 is called, "I-75 Roadway Features that Do Not Meet Modern Standards. Yet it lists three areas where there are no deficient features. Either the title needs to be changed or the three areas need to be dropped from the table.

May 14, 2003

We look forward to working with you in selecting the alternatives to carry forward. If you have any questions please contact me.

Sincerely,



Gerald W. Fulcher, Jr., P.E. Chief
Transportation and Flood Hazard Unit
Geological and Land Management Division
517-335-3172

cc: Mr. Abdel Abdella, U.S. Federal Highway Administration
Ms. Sherry Kamke, U.S. Environmental Protection Agency
Mr. Craig Czarnecki, U.S. Fish and Wildlife Service
Mr. Gary Mannesto, U.S. Army Corps of Engineers
Ms. Mary Vanderlaan, MDEQ – S.E. Michigan District
Mr. Alex Sanchez, MDEQ, Lansing Office



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE

East Lansing Field Office (ES)
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6316

March 21, 2003

Kurt E. Stanley
Tilton & Associates, Inc.
501 Avis Drive, Suite 5C
Ann Arbor, MI 48108

Re: Endangered Species List Request, Proposed I-75 Improvement Project, Madison Heights, Troy, Bloomfield Township, Pontiac Township, Oakland County, Michigan

Dear Dr. Stanley:

Thank you for your March 3, 2003 request for information on endangered, threatened, proposed, or candidate species and critical habitat which may be present within the proposed project areas. Your request and this response are made pursuant to Section 7 of the Endangered Species Act of 1973 (the Act), as amended, (87 Stat. 884, 16 U.S.C. 1531 *et seq.*).

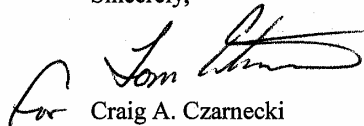
Based on information presently available, there are no endangered, threatened, proposed, or candidate species, or critical habitat occurring within the proposed project areas. This presently precludes the need for further action on this project as required under Section 7 of the Act.

We advise, however, that should a species become officially listed or proposed before completion of this project, the Federal action agency for the work would be required to reevaluate its responsibilities under the Act. Further, should new information become available that indicates listed or proposed species may be present and/or affected, consultation should be initiated with this office.

Since threatened and endangered species data is continually updated, new information pertaining to this project may become available which may modify these recommendations. Therefore, we recommend your agency annually request updates to this list.

We appreciate the opportunity to provide these comments. Please refer any questions directly to Tameka Dandridge of this office at (517) 351-8315 or the above address.

Sincerely,


for Craig A. Czarnecki
Field Supervisor

cc: Michigan Department of Natural Resources, Wildlife Division, Lansing, MI
(Attn: Lori Sargent)

MAR 25 2003



JENNIFER GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES
LANSING

DR. WILLIAM ANDERSON
DIRECTOR

May 14, 2003

ABDELMOEZ ABDALLA
FEDERAL HIGHWAY ADMINISTRATION
315 W ALLEGAN STREET
ROOM 207
LANSING MI 48933

RE: ER02-293 Phase I Cultural Resources Survey, I-75 Freeway Improvement-Oakland County (FHWA)

Dear Mr. Abdalla:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the survey for the above-cited undertaking at the location noted above. Based on the information provided for our review, it is the opinion of the State Historic Preservation Officer (SHPO) that **no historic properties are affected** within the area of potential effects of this undertaking.

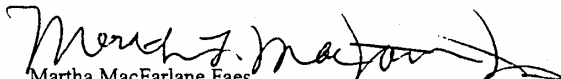
The views of the public are essential to informed decision making in the Section 106 process. Federal Agency Officials or their delegated authorities must plan to involve the public in a manner that reflects the nature and complexity of the undertaking, its effects on historic properties and other provisions per 36 CFR § 800.2(d). We remind you that Federal Agency Officials or their delegated authorities are required to consult with the appropriate Indian tribe and/or Tribal Historic Preservation Officer (THPO) when the undertaking may occur on or affect any historic properties on tribal lands. **In all cases**, whether the project occurs on tribal lands or not, Federal Agency Officials or their delegated authorities are also required to make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties per 36 CFR § 800.2(c-f).

This letter evidences the Federal Highway Administration's compliance with 36 CFR § 800.4 "Identification of historic properties", and the fulfillment of the Federal Highway Administration's responsibility to notify the SHPO, as a consulting party in the Section 106 process, under 36 CFR § 800.4(d)(1) "No historic properties affected".

The State Historic Preservation Office is not the office of record for this undertaking. You are therefore asked to maintain a copy of this letter with your environmental review record for this undertaking. If the scope of work changes in any way, or if artifacts or bones are discovered, please notify this office immediately.

If you have any questions, please contact Brian Conway, Environmental Review Specialist, at (517) 335-2721 or by email at ER@michigan.gov. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,


Martha MacFarlane Faes
Environmental Review Coordinator

for Brian D. Conway
State Historic Preservation Officer

MMF:DLA:ROC:bgg

Copy: Lloyd Baldwin, MDOT

STATE HISTORIC PRESERVATION OFFICE, MICHIGAN HISTORICAL CENTER
702 WEST KALAMAZOO STREET • P.O. BOX 30740 • LANSING, MICHIGAN 48909-8240
(517) 373-1630
www.michigan.gov/hal



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 23 2003

REPLY TO THE ATTENTION OF:

B-19J

Mr. Abdelmoez A. Abdalla
Environmental Program Manager
Federal Highway Administration - Michigan Division
315 W. Allegan St. Room 207
Lansing, Michigan 48933

Re: Concurrence on Purpose & Need Information Provided in I-75 Oakland County
Planning/Environmental Study, Scoping Information, March 2003

Dear Mr. Abdalla:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed your letter of April 9, 2003 and the enclosed I-75 Scoping Information. You requested that our agency provide comments and concurrence on Purpose and Need for this project.

We have reviewed the final scoping package with particular attention on the Planning Basis and Need for the Proposed Action chapter. Information regarding the existing level of service and future traffic projections for Oakland County in the I-75 corridor area demonstrate the need for some type of action in the future. We also note that the condition of the existing roadway and bridges also require some type of future action. We believe that this information shows that there are substantial issues or needs to be addressed.

The scoping package states the following:

Based on this background, the purpose of the project is to:

1. Improve travel efficiency and roadway capacity in the I-75 corridor by upgrading, where feasible, road segments, interchanges, and bridges to modern standards and making other transportation improvements (including the use of Intelligent Transportation Systems [ITS]) designed to accommodate projected year 2025 traffic volumes;
2. Improve the physical condition of existing bridges and road segments; and,
3. Improve motorist safety

Although we concur that the scoping package does explain much about needs in the project area, we believe that the project statement above may preclude alternatives that do not include increased travel lanes on I-75. We encourage the Federal Highway Administration (FHWA) and Michigan Department of Transportation (MDOT) to frame the purpose and need statement in broad enough terms so that other alternatives (i.e., High Occupancy Vehicle lanes and transit

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along Woodward Avenue) that could improve travel efficiency in the study area, other than capacity increases on I-75, could be considered.

We would be available to discuss this topic further. If you have questions, please contact Sherry Kamke at (312) 353-5794 or via email at kamke.sherry@epa.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kenneth A. Westlake". The signature is fluid and cursive, with a large loop at the end.

Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

cc: U.S. Fish and Wildlife Service
East Lansing Field Office
2651 Coolidge Road
East Lansing, Michigan 48823
Attention: Jack Dingeldine

U.S. Army Corps of Engineers
Detroit District Office
P.O. Box 1027
Detroit, Michigan 48231-1027
Attention: Gary Mannesto

Michigan Department of Environmental Quality
Land & Water Management Division
Transportation and Flood Hazard Management Unit
P.O. Box 30458
Lansing, Michigan 48909-7958
Attention: Gerald W. Fulcher Jr., P.E.



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

GLORIA J. JEFF
DIRECTOR

July 2, 2003

Mr. Gerald Fulcher
Transportation and Flood hazard Management Unit
Geological and Land Water Management Division
Michigan Department of Environmental Quality
Constitution Hall - First Floor
525 W. Allegan Street
P.O. Box 30458
Lansing, Michigan 48909

Dear Mr. Fulcher:

The Michigan Department of Transportation (MDOT) has recently completed the delineation of wetlands for the proposed widening of I-75 between 8 Mile Road and M-59 in Oakland County, Michigan. The results of the delineation indicate that approximately one acre of wetlands would be impacted by the proposed project. Previously, MDOT estimated that eight acres of wetlands would be impacted. However, after working closely with the Michigan Department of Environmental Quality (MDEQ), the wetland impacts were reduced from eight acres to one acre. The types of wetlands being impacted include: palustrine emergent and palustrine scrub/shrub. As a result of this change in wetland impacts, the 404 regulatory process will no longer be required for this project.

Your continued involvement and participation in the review and comment of this project is highly valued. MDOT will continue to involve your agency in the review of the Environmental Impact Statement (EIS).

Thank you for your cooperation and interest in this project.

Sincerely,

Margaret M. Barondess, Manager
Environmental Section
Project Planning Division

cc: J. J. Steele, FHWA
File

MURRAY D. VAN WAGONER BUILDING • P.O. BOX 30050 • LANSING, MICHIGAN 48909
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U.S. Department
of Transportation

Federal Highway
Administration

Michigan Division

315 W. Allegan St., Room 207
Lansing, Michigan 48933

September 25, 2003

Mr. Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
United States Environmental Protection Agency
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Westlake:

Proposed Widening of I-75 from M-102 (8 Mile Road) to M-59
Oakland County, Michigan

The Michigan Department of Transportation (MDOT) has recently completed the delineation of wetlands for the proposed widening of I-75 between 8 Mile Road and M-59 in Oakland County, Michigan. Previously, the MDOT estimated that eight acres of wetlands would be impacted. Accordingly, the FHWA has requested your agency's comments and concurrence regarding the first NEPA/Section 404 merger process. The results of the delineation indicate that approximately only one acre of wetlands would be impacted by the proposed project. As a result of this change in wetland impacts, the NEPA/Section 404 merger process will no longer be required for this project.

Your continued involvement in reviewing and providing meaningful comments of this project is highly valued and appreciated. The FHWA and MDOT will continue to involve your agency in the review of the Environmental Impact Statement (EIS).

If you need more information, please do not hesitate to contact me by phone at (517) 702-1820 or via email at abdelmoez.abdalla@fhwa.dot.gov. Thank you for your cooperation and interest in this project.

Sincerely,

a.a. abdalla

Abdelmoez A. Abdalla
Environmental Program Manager

For: James J. Steele
Division Administrator

cc: Lori Noblet, MDOT, Environment



U.S. Department
of Transportation

Federal Highway
Administration

Michigan Division

315 W. Allegan St., Room 207
Lansing, Michigan 48233

September 25, 2003

Mr. Craig A. Czarnecki, Field Supervisor
U.S. Fish and Wildlife Service
2651 Coolidge Road
East Lansing, MI 48823

Dear Mr. Czarnecki:

Proposed Widening of I-75 from M-102 (8 Mile Road) to M-59
Oakland County, Michigan

The Michigan Department of Transportation (MDOT) has recently completed the delineation of wetlands for the proposed widening of I-75 between 8 Mile Road and M-59 in Oakland County, Michigan. Previously, the MDOT estimated that eight acres of wetlands would be impacted. Accordingly, the FHWA has requested your agency's comments and concurrence regarding the first NEPA/Section 404 merger process. The results of the delineation indicate that approximately only one acre of wetlands would be impacted by the proposed project. As a result of this change in wetland impacts, the NEPA/Section 404 merger process will no longer be required for this project.

Your continued involvement in reviewing and providing meaningful comments of this project is highly valued and appreciated. The FHWA and MDOT will continue to involve your agency in the review of the Environmental Impact Statement (EIS).

If you need more information, please do not hesitate to contact me by phone at (517) 702-1820 or via email at abdelmoez.abdalla@fhwa.dot.gov. Thank you for your cooperation and interest in this project.

Sincerely,

a. a. abdalla

Abdelmoez A. Abdalla
Environmental Program Manager

For: James J. Steele
Division Administrator

cc: Lori Noblet, MDOT, Environment

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I-75 Oakland County Planning / Environmental Study
CS 63174, JN 55776
Final Environmental Impact Statement
Green Sheet: Project Mitigation Summary

<i>Impact Category</i>	<i>Mitigation Measures</i>
I. Social and Economic Environment	
a. Noise	Analysis finds 18 individual reasonable and feasible noise walls, plus replacement noise walls in Madison Heights would total 4.9 miles in length (see Table 4-14).
b. Fire Hydrant Access	MDOT will consult with local fire departments during the design phase to ensure adequate placement of and access to fire hydrants in locations where noise walls are to be constructed.
c. Visual Effects	Noise wall construction and construction materials will be discussed with the affected public in the vicinity of potential construction.
II. Natural Environment	
a. Wetlands	0.4 acres of impacted wetlands in the Square Lake Road Interchange will be replaced by 0.6 acres of wetlands in Armada Township in Macomb County. A permit will be obtained from the Michigan Department of Environmental Quality for this compensatory wetland mitigation. A preliminary Wetland Mitigation Plan has been approved by MDEQ.
b. Tree Removal/ Clearing/Landscaping	Mature trees will be preserved within MDOT right-of-way (principally at fence lines), where safety requirements are met. Property owners will be notified before any trees in front of their residences are removed and will be offered replacement trees. Native vegetation will be considered in plantings.
c. Water Quality	For highway runoff, storm water management facilities will include detention basins and grassed channels or swales to reduce the concentration of road contaminants reaching receiving bodies of water. Ditch check dams will be installed to control runoff velocities. Storm water management will be incorporated into final roadway design. The project will include separation of MDOT storm water south of 12 Mile Road from the combined sewer system that now carries this storm water. Detention will be included in pump stations and possibly within the 12 Mile Road interchange allowing settling of debris and sediment. Oil/water separators will be included in the system.
III. Hazardous / Contaminated Materials	
a. Contaminated Sites	A <i>Project Area Contamination Survey</i> has been completed. One site has been identified for a Preliminary Site Investigation, prior to right-of-way acquisition. Any areas of contamination found by that PSI will be marked on design plans.

	<p>Additional standard mitigation measures that could apply include:</p> <ul style="list-style-type: none"> • Testing/treatment of water from any dewatering operations before pumping to storm drains or surface water discharge points. • Testing of river bottom sediments to determine proper disposal methods. • Preparation of underground utility plans to ensure no deep utility cuts will impact any contaminated areas. Any utility cuts in contaminated areas will be reviewed to ensure proper excavation and backfill methods. • Preparation of a Risk Assessment Plan, which includes a Worker Health and Safety Plan, to reduce dermal exposure and address direct contact issues, if contaminated materials are encountered. • Closing and abandoning any monitoring wells properly.
IV. Construction	
a. Maintenance of Traffic	Two lanes of traffic will be maintained in both directions at all times on I-75.
b. Vibration	Basement surveys will be offered in areas where vibration effects could occur. These areas will be identified during the design phase, where pavement and bridge removal will occur, or where piling and/or steel sheeting is planned. Impacts are not anticipated at this time.
c. Wetlands	Delineated wetlands are to be included on construction plans sheets, so they can be flagged for avoidance during construction.
d. Parks	Reconstruction of the service drive adjacent to Maddock Park may be necessary. No grading permit will be obtained for the park.